

**DRAFT**  
**INITIAL STUDY AND**  
**MITIGATED NEGATIVE DECLARATION**

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**KOALA LA LLC.**  
**APN 3210-631-012 & 013**  
**CUP 21-22, LDP 21-22, & TPM 20454**  
**ADELANTO, CALIFORNIA**



**LEAD AGENCY:**

**CITY OF ADELANTO**  
**COMMUNITY DEVELOPMENT DEPARTMENT**  
**PLANNING DIVISION**  
**11600 AIR EXPRESSWAY**  
**ADELANTO, CALIFORNIA 92301**

**REPORT PREPARED BY:**

**BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING**  
**2211 S. HACIENDA BOULEVARD, SUITE 107**  
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**APRIL 7, 2022**

ADLT 054

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## MITIGATED NEGATIVE DECLARATION

**PROJECT NAME:** Koala LA, LLC.; CUP 21-22, LDP 21-22, and TPM 20454.

**PROJECT APPLICANT:** The Applicant for the proposed project is Vazgen Khachatryan, Koala La, LLC, 115 Skyline Drive, Burbank, California 91501

**PROJECT LOCATION:** Adelanto, California 92301. The corresponding Assessor Parcel Number (APN) is 3210-631-012 & 013. The proposed project site is located on the southwest corner of Rancho Road and Koala Road in the southwestern portion of the City.

**CITY AND COUNTY:** City of Adelanto, San Bernardino County.

**PROJECT:** The City of Adelanto is reviewing an application to develop a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).

**FINDINGS:** The environmental analysis provided in the attached Initial Study indicates that the proposed project will not result in any significant adverse unmitigable impacts. For this reason, the City of Adelanto determined that a *Mitigated Negative Declaration* is the appropriate CEQA document for the proposed project. The following findings may be made based on the analysis contained in the attached Initial Study:

- The proposed project *will not* have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number, or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.
- The proposed project *will not* have impacts that are individually limited, but cumulatively considerable.
- The proposed project *will not* have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

The environmental analysis is provided in the attached Initial Study prepared for the proposed project. The project is also described in greater detail in the attached Initial Study.



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## SECTION 1 INTRODUCTION

### 1.1 PURPOSE OF THIS INITIAL STUDY

This Initial Study analyzes the environmental impacts associated with the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>1</sup>

The City of Adelanto is the designated *Lead Agency*, and as such, the City will be responsible for the project's environmental review. Section 21067 of California Environmental Quality Act (CEQA) defines a Lead Agency as the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect on the environment.<sup>2</sup> As part of the proposed project's environmental review, the City of Adelanto has authorized the preparation of this Initial Study.<sup>3</sup> The primary purpose of CEQA is to ensure that decision-makers and the public understand the environmental implications of a specific action or project. An additional purpose of this Initial Study is to ascertain whether the proposed project will have the potential for significant adverse impacts on the environment once it is implemented. Pursuant to the CEQA Guidelines, additional purposes of this Initial Study include the following:

- To provide the City of Adelanto with information to use as the basis for deciding whether to prepare an environmental impact report (EIR), mitigated negative declaration, or negative declaration for a project;
- To facilitate the project's environmental assessment early in the design and development of the proposed project;
- To eliminate unnecessary EIRs; and,
- To determine the nature and extent of any impacts associated the proposed project.

Although this Initial Study was prepared with consultant support, the analysis, conclusions, and findings made as part of its preparation fully represent the independent judgment and position of the City of Adelanto, in its capacity as the Lead Agency. The City determined, as part of this Initial Study's preparation, that a Mitigated Negative Declaration is the appropriate environmental document for the proposed project's CEQA review. Certain projects or actions may also require oversight approvals or permits from other public agencies. These other agencies are referred to as *Responsible Agencies* and *Trustee Agencies*, pursuant to Sections 15381 and 15386 of the State CEQA Guidelines.<sup>4</sup> This Initial Study and the *Notice of Intent to*

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<sup>1</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.

<sup>2</sup> California, State of. *California Public Resources Code. Division 13, Chapter 2.5. Definitions*. as Amended 2001. §21067.

<sup>3</sup> Ibid. (CEQA Guidelines) §15050.

<sup>4</sup> California, State of. Public Resources Code Division 13. *The California Environmental Quality Act. Chapter 2.5, Section 21067 and Section 21069*. 2000.

*Adopt (NOIA) a Mitigated Negative Declaration* will be forwarded to responsible agencies, trustee agencies, and the public for review and comment. This Initial Study and Mitigated Negative Declaration will be forwarded to the State of California Office of Planning Research (the State Clearinghouse). A 30-day public review period will be provided to allow these entities and other interested parties to comment on the proposed project and the findings of this Initial Study.<sup>5</sup> Questions and/or comments should be submitted to the following contact person:

Mary Blais, Contract Planner  
City of Adelanto, Planning Division  
11600 Air Expressway  
Adelanto, California 92301

## 1.2 INITIAL STUDY'S ORGANIZATION

The following annotated outline summarizes the contents of this Initial Study:

- *Section 1 Introduction* provides the procedural context surrounding this Initial Study's preparation and insight into its composition.
- *Section 2 Project Description* provides an overview of the existing environment as it relates to the project area and describes the proposed project's physical and operational characteristics.
- *Section 3 Environmental Analysis* includes an analysis of potential impacts associated with the construction and the subsequent operation of the proposed project.
- *Section 4 Conclusions* summarizes the findings of the analysis.
- *Section 5 References* identifies the sources used in the preparation of this Initial Study.



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<sup>5</sup> California, State of. Public Resources Code Division 13. *The California Environmental Quality Act. Chapter 2.6, Section 2109(b)*. 2000.

## SECTION 2 PROJECT DESCRIPTION

### 2.1 PROJECT OVERVIEW

This Initial Study analyzes the environmental impacts associated with the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>6</sup>

### 2.2 PROJECT LOCATION

The City of Adelanto is located approximately 60 miles northeast of Downtown Los Angeles and 30 miles north of the City of San Bernardino. Adelanto is bounded on the north by unincorporated San Bernardino County; on the east by Victorville and unincorporated San Bernardino County; the south by Hesperia and unincorporated San Bernardino County; and on the west by unincorporated San Bernardino County.<sup>7</sup> Regional access to the City of Adelanto is provided by three area highways: the Mojave Freeway (Interstate 15), extending in a southwest to northeast orientation approximately three miles east of the City; U.S. Highway 395, traversing the eastern portion of the City in a northwest to southeast orientation; and Palmdale Road (State Route 18), which traverses the southern portion of the City in an east to west orientation.<sup>8</sup> The location of Adelanto, in a regional context, is shown in Exhibit 2-1. A citywide map is provided in Exhibit 2-2.

The proposed project site has an Assessor Parcel Number (APN) of 3210-631-012 and 013. The proposed project site is located to the southwest of the intersection of the future Violet Road right-of-way and Koala Road in the southcentral portion of the City. Koala Road extends along the project site's east side while the future Violet Road right-of-way extends along the project site's north side. The project site is located within the Adelanto 7½ USGS Quadrangle (Township 6 North, Range 6 West, Section 36), 1956. The project site's latitude and longitude are 34°55'99.22"N and -117°45'48.06"W. A local vicinity map is provided in Exhibit 2-3. An aerial photograph of the site and the surrounding area is provided in Exhibit 2-4.

### 2.3 ENVIRONMENTAL SETTING

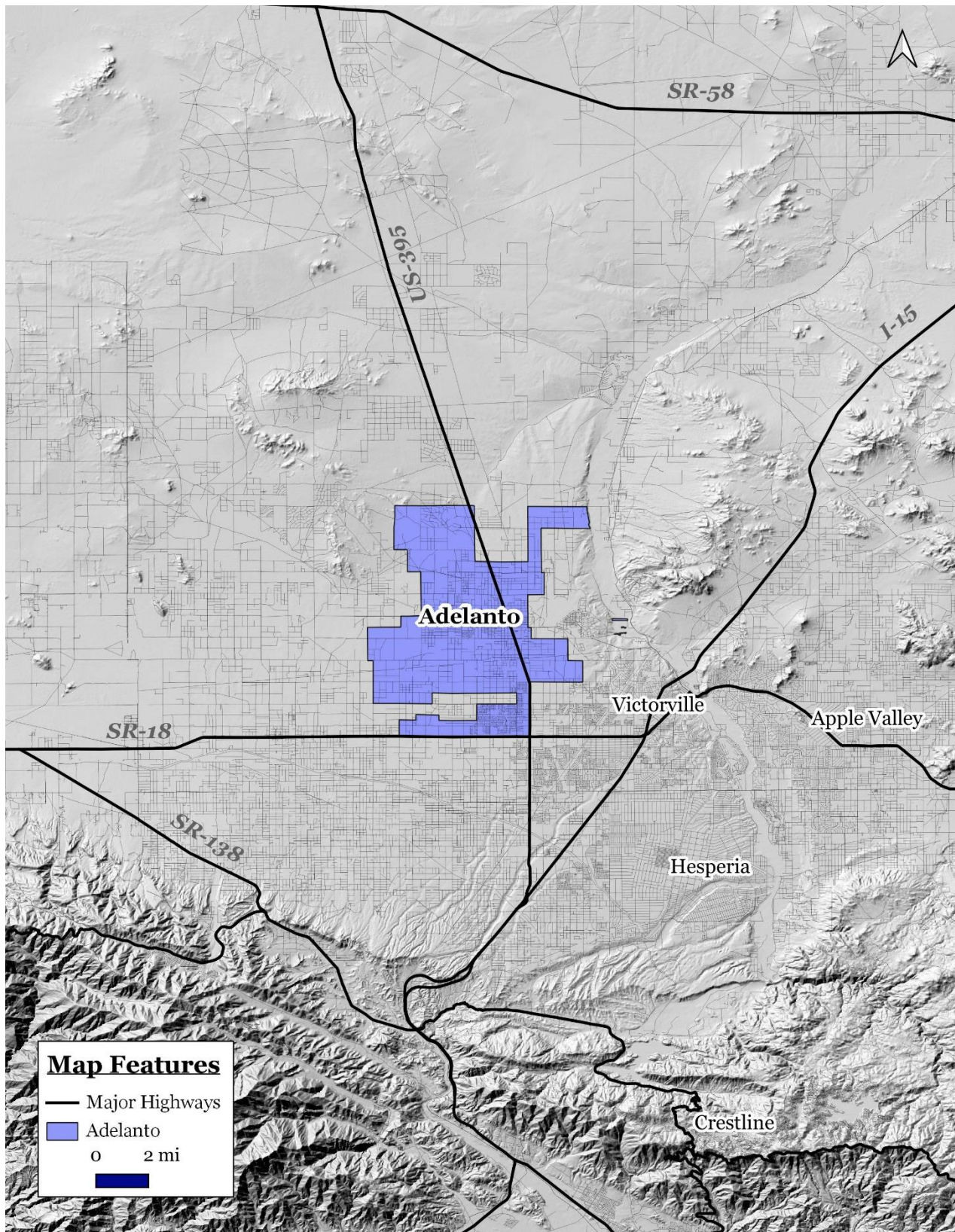
The proposed project site is located on a 6.05-acre (263,730 square-foot) parcel that is currently vacant and undeveloped. The property currently has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).

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<sup>6</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.

<sup>7</sup> Blodgett Baylosis Environmental Planning. 2021.

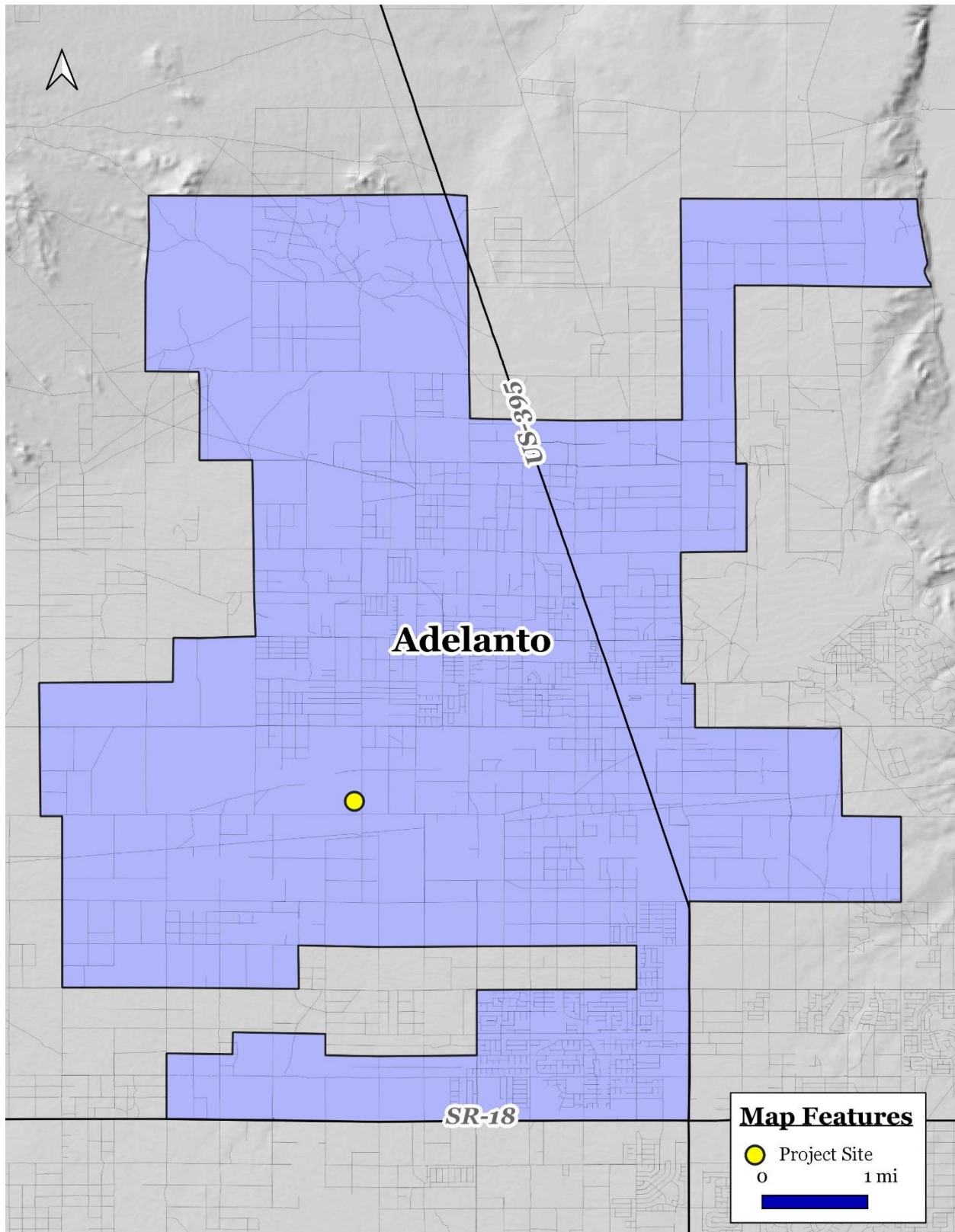
<sup>8</sup> Google Earth. Website accessed August 4, 2021.



## EXHIBIT 2-1 REGIONAL MAP

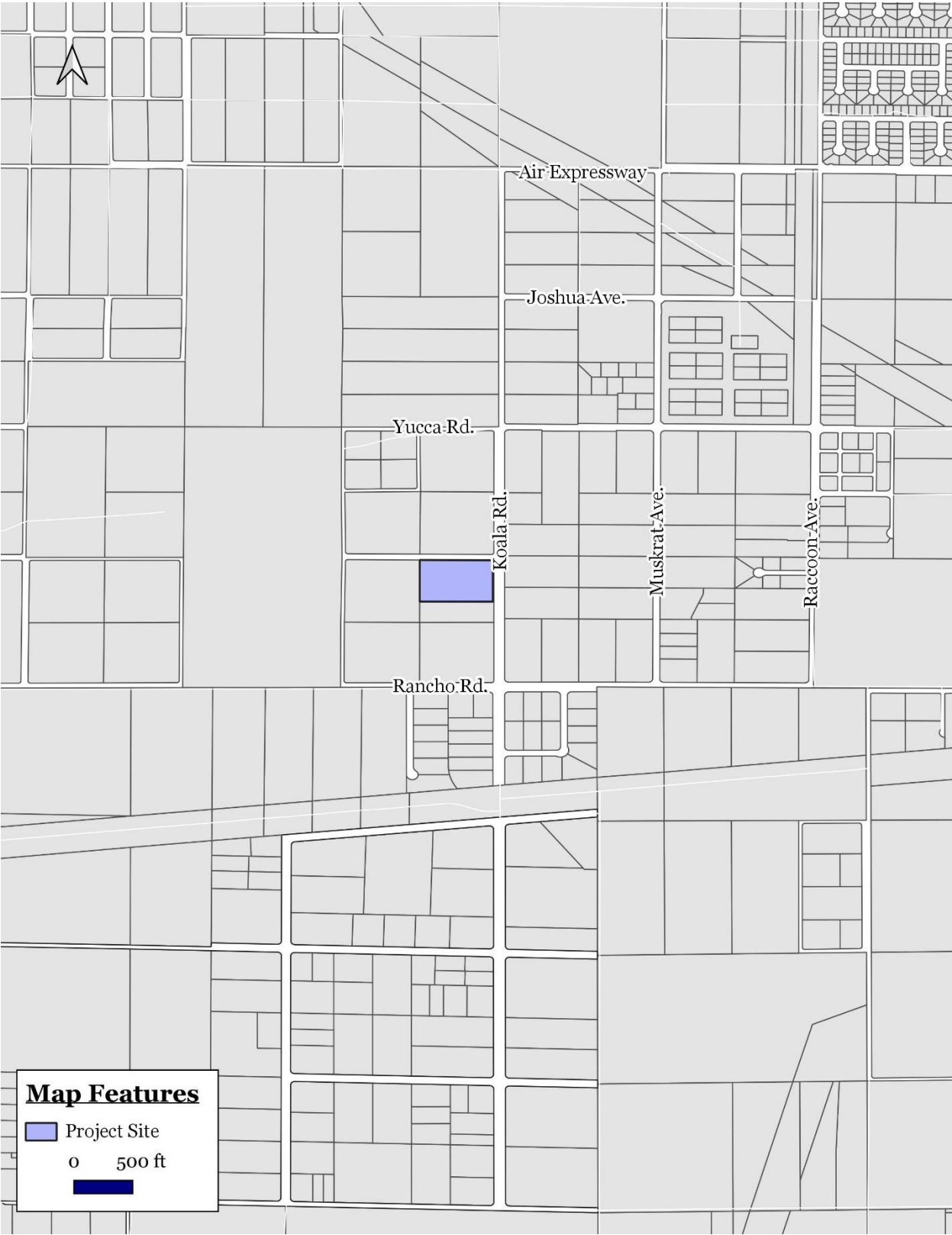
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING





## EXHIBIT 2-2 CITYWIDE MAP

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING



**EXHIBIT 2-3**  
**LOCAL MAP**

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING





**EXHIBIT 2-4**  
**AERIAL IMAGE OF PROJECT SITE**  
SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

Access to the project site would be provided by a roadway connection on the west side of the project site along Koala Road and on the south side of the future Violet Road right-of-way. Land uses and development located in the vicinity of the proposed project are outlined below:

- *North of the project site:* Vacant and undisturbed land parcels are located directly to the north of the project site. These parcels are zoned as *Manufacturing/Industrial (MI)*.<sup>9</sup>
- *East of the project site:* Abutting the project site to the east, is Koala Road. Further east are various industrial uses. This area is zoned as *Manufacturing/Industrial (MI)*.
- *South of the project site:* Vacant land is located to the south. Rancho Road is located further south approximately 770 feet. This parcel was recently approved for a new cannabis facility (CUP 21-16 and LDP-21-14). These parcels are zoned *Manufacturing/Industrial (MI)*.
- *West of the project site:* Vacant and undisturbed land abuts the project site to the west. These parcels are zoned *Manufacturing/Industrial (MI)*.

As indicated previously, the proposed project site is located on a 6.05-acre (263,730 square-foot) parcel that is currently vacant and undeveloped. The site contains a disturbed creosote bush community that supports vegetation such as Nevada joint fir, silver cholla, Joshua tree, rubber rabbitbrush, California buckwheat, and paper bag plant. The site has exhibited considerable human disturbance including illegal dumping and off-road activities. The western portion of the site is traversed by an intermittent stream channel, designated as SPL-2017-00143. According to the EPA's database, this stream is *not* classified as a "Water of the U.S." by the U.S. Army Corps of Engineers. The stream bed was last considered by the Army Corps of Engineers on July 19, 2017. An aerial photograph of the project site and the surrounding area is provided in Exhibit 2-4.

## 2.4 PROJECT DESCRIPTION

### 2.4.1 PHYSICAL CHARACTERISTICS OF THE PROPOSED PROJECT

The proposed project site is located on a 6.05-acre (263,730 square-foot) parcel that is currently vacant and undeveloped. Key elements of the proposed project are summarized below and on the following page.

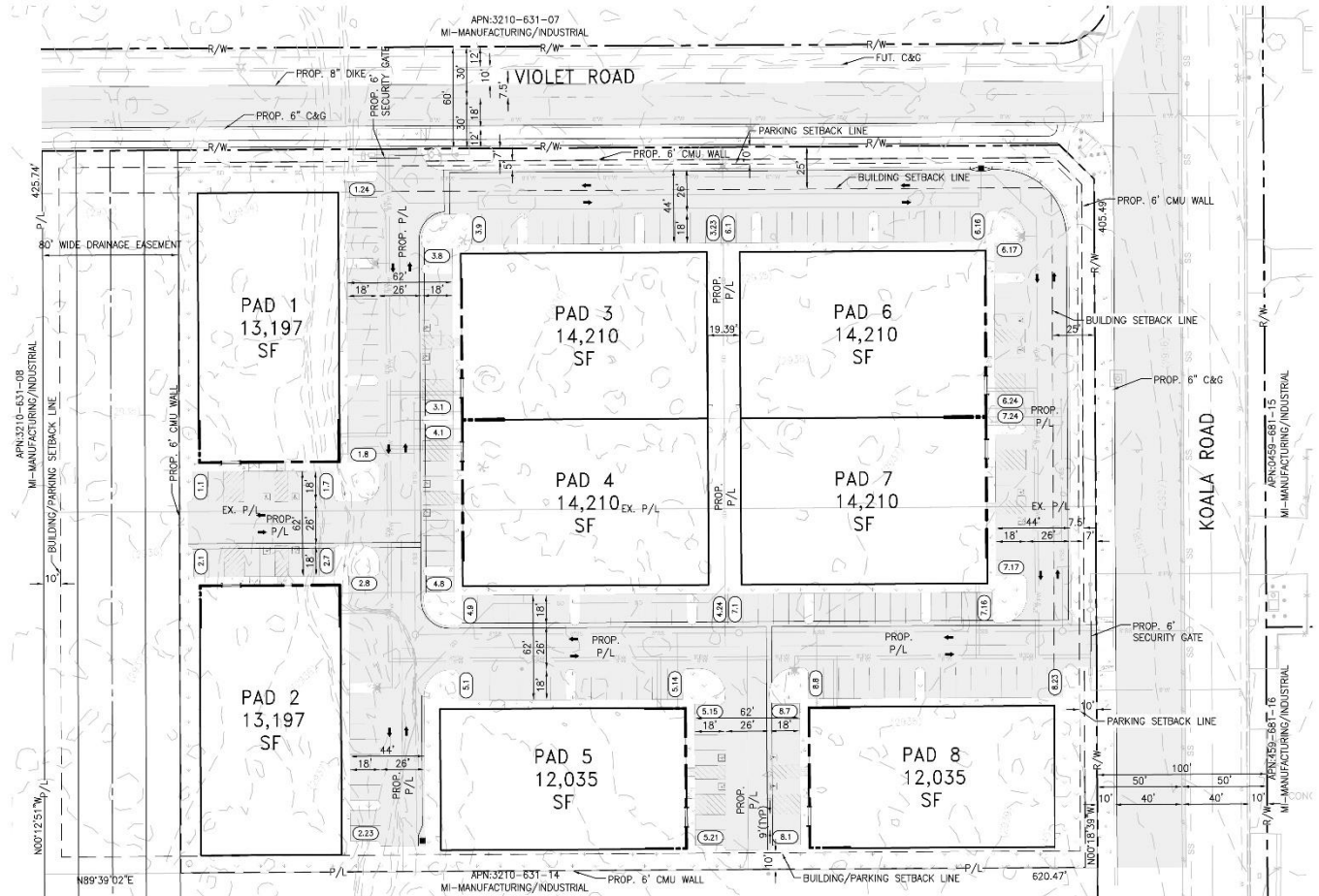
- *Proposed Site Plan.* The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. The total building area would total 2.4-acres. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>10</sup>

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<sup>9</sup> Google Maps and City of Adelanto Zoning Map. Website accessed on August 5, 2021.

<sup>10</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.

- *Building No. 1.* This building would consist of two levels and would have a total floor area of 26,394 square feet. Both the first and second floors would each have a floor area of 13,197 square feet. A total of 24 parking spaces would be provided.
- *Building No. 2.* This building would consist of two levels and would have a total floor area of 26,394 square feet. Both the first and second floors would each have a floor area of 13,197 square feet. A total of 23 parking spaces would be provided.
- *Building No. 3.* This building would consist of two levels and would have a total floor area of 28,420 square feet. Both the first and second floors would each have a floor area of 14,210 square feet. A total of 25 parking spaces would be provided.
- *Building No. 4.* This building would consist of two levels and would have a total floor area of 28,420 square feet. Both the first and second floors would each have a floor area of 14,210 square feet. A total of 25 parking spaces would be provided.
- *Building No. 5.* This building would consist of two levels and would have a total floor area of 24,070 square feet. Both the first and second floors would each have a floor area of 12,035 square feet. A total of 23 parking spaces would be provided.
- *Building No. 6.* This building would consist of two levels and would have a total floor area of 28,420 square feet. Both the first and second floors would each have a floor area of 14,210 square feet. A total of 25 parking spaces would be provided.
- *Building No. 7.* This building would consist of two levels and would have a total floor area of 28,420 square feet. Both the first and second floors would each have a floor area of 14,210 square feet. A total of 25 parking spaces would be provided.
- *Building No. 8.* This building would consist of two levels and would have a total floor area of 28,420 square feet. Both the first and second floors would each have a floor area of 14,210 square feet. A total of 23 parking spaces would be provided.
- *Access and Parking.* Access to the project site will be provided by Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east).The new development would be met by 185 standard parking spaces and 16 ADA-compliant parking stalls will be provided. All internal roadways and parking areas will be paved. The adjacent roadways, Koala Road and Violet Road, must also be improved pursuant to the City's requirements.
- *On-Site Improvements.* Power (electrical) would be met with connections to the existing utility lines located in Koala Road including a new 8-inch water line and a new 6-inch sanitary sewer line.
- *Security.* On-site security will continue to be provided twenty-four hours a day, seven days a week by security guards. In addition, shielded security lighting that would conform with all municipal lighting regulations will be installed on the premises.



**EXHIBIT 2-5**  
**SITE PLAN**  
SOURCE: BLUE ENGINEERING



- *Landscaping and Drainage Easement.* 34,950 square feet (0.80-acres) of the project site will be dedicated to landscaping. The landscaped areas will surround each of the new proposed buildings. The western portion of the site will be included within an 80-foot-wide drainage easement. This development will not require the approval of a Section 404 Permit since the drainage channel is not a designated “Water of the United States.”

#### **2.4.2 OPERATIONAL CHARACTERISTICS OF THE PROPOSED PROJECT**

As indicated previously, the proposed development will involve the construction of eight, two-story cannabis cultivation, distribution, and manufacturing facilities with a total floor area of 214,608 square-feet. Key operational elements are outlined below:

- *Cultivation Method.* The cultivation method will be soil based or organic. Organic cultivation involves the use of soil and plant or manure-based composts. Organic soils are generally rich with living microbes that slowly break down components in the soil and release nutrients to the plant. Each of the new buildings will have approximately 50% of their floor area devoted to cultivation area for a total area devoted to cultivation.
- *Equipment.* The cultivation and manufacturing would occur inside the individual buildings. As a result, the equipment would be limited to that suitable for use in an indoor environment. Planting, cultivation, and trimming would be undertaken by trained staff. Organic cultivation involves the use of soil and plant or manure-based composts. Organic soils are rich with living microbes that slowly break down components in the soil and release nutrients to the plant. The total area devoted to cultivation will be approximately 207,304 square feet.
- *Utilities.* The proposed project will include a new 8-inch water line and a 6-inch sewer line connection to existing lines in Koala Road. Two-inch laterals will then provide connections to the individual buildings. Water and sewer service would be provided by the Adelanto Water Department. Electrical service would be provided by Southern California Edison.
- The project will be required to implement mitigation to control odors, air, and volatile organic chemicals (VOC) emissions (refer to Section 2.2 and Section 3.9).
- *Employment.* The new cultivation facility is projected to employ 150 to 190 persons per day at full capacity.
- *Hours of Operation.* The hours of on-site operations for the proposed new development will be Monday through Sunday, 8:00 AM to 5:00 PM and 24-hours a day security.<sup>11</sup>

#### **2.4.3 CONSTRUCTION CHARACTERISTICS**

The construction for the current proposed project is assumed to commence in January 2023 and would take approximately nine months to complete.<sup>12</sup> The key construction phases are outlined in the paragraphs that follow.

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<sup>11</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 5, 2021.

<sup>12</sup> Ibid.

- *Phase 1 Grading.* The project site would be graded and readied for the construction. The site would be graded to a depth of approximately 3-inches to 6-inches in depth. The typical heavy equipment used during this construction phase would include graders, bulldozers, offroad trucks, back-hoes, and trenching equipment. This phase would require one month to complete.
- *Phase 2 Site Preparation.* During this phase, the building footings, utility lines, and other underground infrastructure would be installed. The typical heavy equipment used during this construction phase would include bulldozers, offroad trucks, back-hoes, and trenching equipment. This phase would require one month to complete.
- *Phase 3 Building Construction.* The new buildings would be constructed during this phase. The typical heavy equipment used during this construction phase would include offroad trucks, cranes, and fork-lifts. This phase will take approximately five months to complete.
- *Phase 4 Paving and Finishing.* This concluding phase would involve the paving and finishing. The typical heavy equipment used during this construction phase would include trucks, backhoes, rollers, pavers, and trenching equipment. The completion of both phases will take approximately two months to complete.

## 2.5 DISCRETIONARY ACTIONS

A Discretionary Action is an action taken by a government agency (for this project, the government agency is the City of Adelanto) that calls for an exercise of judgment in deciding whether to approve a project. The following discretionary approvals are required:

- Approval of a Conditional Use Permit (CUP 21-22);
- Approval of a Land Development Plan (LDP 21-22);
- Approval of a Tentative Tract Map (TPM 20454); and
- Approval of the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP).

In addition, the proposed project would require a manufacturing license, a distribution license, and one or more cultivation licenses from the State Department of Cannabis Control (DCC). The DCC is responsible for licensing, regulation, and enforcement of commercial cannabis business activities, as defined in the Medicinal and Adult Use Cannabis Regulation and Safety Act (MAUCRSA) and DCC regulations related to cannabis business activities (Bus. & Prof. Code, § 26012(a)).



## SECTION 3 ENVIRONMENTAL ANALYSIS

This section of the Initial Study analyzes the potential environmental impacts that may result from the proposed project's implementation. The issue areas evaluated in this Initial Study include the following:

Aesthetics (Section 3.1);	Mineral Resources (Section 3.12) ;
Agricultural & Forestry Resources (Section 3.2);	Noise (Section 3.13);
Air Quality (Section 3.3);	Population & Housing (Section 3.14).
Biological Resources (Section 3.4);	Public Services (Section 3.15);
Cultural Resources (Section 3.5);	Recreation (Section 3.16);
Energy (Section 3.6)	Transportation (Section 3.17);
Geology & Soils (Section 3.7);	Tribal Cultural Resources (Section 3.18);
Greenhouse Gas Emissions; (Section 3.8);	Utilities (Section 3.19);
Hazards & Hazardous Materials (Section 3.9);	Wildfire (Section 3.20); and,
Hydrology & Water Quality (Section 3.10);	Mandatory Findings of Significance (Section
Land Use & Planning (Section 3.11);	3.21).

The environmental analysis included in this section reflects the Initial Study Checklist format used by the City of Adelanto in its environmental review process (refer to Section 1.3 herein). Under each issue area, an analysis of impacts is provided in the form of questions followed by corresponding detailed responses. For the evaluation of potential impacts, questions are stated, and an answer is provided according to the analysis undertaken as part of this Initial Study's preparation. To each question, there are four possible responses:

- *No Impact.* The proposed project *will not* have any measurable environmental impact on the environment.
- *Less Than Significant Impact.* The proposed project *may have* the potential for affecting the environment, although these impacts will be below levels or thresholds that the City of Adelanto or other responsible agencies consider to be significant.
- *Less Than Significant Impact with Mitigation.* The proposed project *may have* the potential to generate impacts that will have a significant impact on the environment. However, the level of impact may be reduced to levels that are less than significant with the implementation of mitigation measures.
- *Potentially Significant Impact.* The proposed project may result in environmental impacts that are significant.

This Initial Study will assist the City of Adelanto in deciding as to whether there is a potential for significant adverse impacts on the environment associated with the implementation of the proposed project.

### 3.1 AESTHETICS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Except as provided in Public Resources Code Section 21099, would the project have a substantial adverse effect on a scenic vista?				×
B. Except as provided in Public Resources Code Section 21099, would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				×
C. Except as provided in Public Resources Code Section 21099, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from a publicly accessible vantage point)? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				×
D. Except as provided in Public Resources Code Section 21099, would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				×

#### ANALYSIS OF ENVIRONMENTAL IMPACTS

**A. Except as provided in Public Resources Code Section 21099, would the project have a substantial adverse effect on a scenic vista? • No Impact**

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The project site is currently vacant and undeveloped and contains a disturbed creosote bush community that supports vegetation such as Nevada joint fir, silver cholla, Joshua tree, rubber rabbitbrush, California buckwheat, and paper bag plant. The site has exhibited considerable human disturbance including illegal dumping and off-road activities. The western portion of the site is traversed by an intermittent stream channel, designated as SPL-2017-00143. According to the EPA's database, this stream *is not* classified as a "Water of the U.S." by the U.S. Army Corps of Engineers. The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>13</sup>

The dominant scenic views from the project site include the views of the San Bernardino and San Gabriel Mountains, located 20 miles south and southeast of the site. In addition, local views are already dominated by regional Southern California Edison (SCE) transmissions towers and transmission lines. Views from the

<sup>13</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.



mountains will not be obstructed. Once operational, views of the aforementioned mountains will continue to be visible from the public right-of-way. As a result, no impacts will occur.

- B.** *Except as provided in Public Resources Code Section 21099, would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? • No Impact.*

According to the California Department of Transportation, none of the streets located adjacent to the proposed project site are designated scenic highways and there are no state or county designated scenic highways in the vicinity of the project site.<sup>14</sup> There are no officially designated highways located near the city. The nearest highways that are eligible for designation as a scenic highway include SR-2 (from SR-210 to SR-138), located 11 miles southwest of the City; SR-58 (from SR-14 to I-15), located 20 miles north of the City; SR-138 (from SR-2 to SR-18), located 13 miles south of the City; SR-173 (from SR-138 to SR-18), located 15 miles southeast of the City; and, SR-247 (from SR-62 to I-15), located 23 miles east of the City. The City of Adelanto 2035 Sustainable Plan identifies prominent view sheds within the city. These view sheds are comprised primarily of undeveloped desert land, the Mojave River, and distant views of the mountains.<sup>15</sup> The site would not qualify as undeveloped desert land since the site is currently zoned as Manufacturing/Industrial (MI) with adjacent land parcels disturbed with the presence of telecommunication towers. The proposed site does not contain any sensitive habitats. Lastly, the project site does not contain any buildings listed in the State or National registrar. As a result, no impacts will occur.

- C.** *Except as provided in Public Resources Code Section 21099, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from a publicly accessible vantage point)? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? • No Impact*

There are no protected views in the vicinity of the project site and the City does not contain any scenic vistas or protected viewsheds within the City's corporate boundaries. In addition, the City does not have any zoning regulations or other regulations governing scenic quality other than the development standards for which the new buildings will conform to. As a result, no impacts will occur.

- D.** *Except as provided in Public Resources Code Section 21099, would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? • No Impact*

The proposed project would not expose any sensitive receptors to daytime or nighttime light trespass, since there are no light-sensitive land uses located adjacent to the property. Project-related sources of nighttime light would include parking area exterior lights, security lighting, and vehicular headlights. The proposed project will not expose any sensitive receptors to daytime or nighttime light trespass since the project will be in conformance with Section 17.90.040 – Lighting of the City of Adelanto Municipal Code. The City's Code requirements includes the following requirements related to outdoor lighting:

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<sup>14</sup> California Department of Transportation. Official Designated Scenic Highways.

<sup>15</sup> MIG Hogle-Ireland. *Adelanto North 2035 Comprehensive Sustainable Plan*. August 27, 2014.

- (a) All on-site lighting shall be energy efficient, stationary, and directed away from adjoining properties and public rights-of-way.
- (b) Light fixtures shall be shielded so no light is emitted above the horizontal plane of the bottom of the light fixture.
- (c) Light fixtures shall be shielded so no light above 0.5 footcandle spills over onto adjacent properties and rights-of-way. There shall be no spillover (0.0 footcandle) onto adjacent residential used or zoned properties.

The proposed project must also comply with the DCC's applicable regulatory specifications requirements that all outdoor lighting for security purposes must be shielded and downward facing. (Cal. Code Regs., tit. 3 § 16304(a)(7)). As a result, no light-related impacts are anticipated.

### **MITIGATION MEASURES**

The proposed project will not expose any sensitive receptors to daytime or nighttime light trespass since the project will be in conformance with Section 17.90.040 – Lighting of the City of Adelanto Municipal Code. The proposed project must also comply with the DCC's applicable regulatory specifications requirements that all outdoor lighting for security purposes must be shielded and downward facing. (Cal. Code Regs., tit. 3 § 16304(a)(7)). As a result, no light-related impacts are anticipated. The analysis of aesthetics concluded that no impact on these resources would occur as part of the proposed project's implementation. As a result, no mitigation is required.

### 3.2 AGRICULTURE & FORESTRY RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
<b>A.</b> Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses?				✗
<b>B.</b> Would the project conflict with existing zoning for agricultural uses, or a Williamson Act Contract?				✗
<b>C.</b> Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				✗
<b>D.</b> Would the project result in the loss of forest land or conversion of forest land to a non-forest use?				✗
<b>E.</b> Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to a non-forest use?				✗

#### ANALYSIS OF ENVIRONMENTAL IMPACTS

- A.** *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses? • No Impact.*

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The project site is currently vacant and undeveloped and contains a disturbed creosote bush community that supports vegetation such as Nevada joint fir, silver cholla, Joshua tree, rubber rabbitbrush, California buckwheat, and paper bag plant. The site has exhibited considerable human disturbance including illegal dumping and off-road activities. The western portion of the site is traversed by an intermittent stream channel, designated as SPL-2017-00143. According to the EPA's database, this stream *is not* classified as a "Water of the U.S." by the U.S. Army Corps of Engineers. The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>16</sup>

<sup>16</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.

- B.** *Would the project conflict with existing zoning for agricultural uses, or a Williamson Act Contract? • No Impact.*

The project site is currently zoned as Manufacturing/Industrial (MI). The property is vacant and undeveloped and there are no agricultural uses located within the site that would be affected by the project's implementation. According to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract.<sup>17</sup> As a result, no impacts on existing Williamson Act Contracts will result from the proposed project's implementation.

- C.** *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? • No Impact.*

The proposed project involves the construction of eight, two-story cannabis cultivation, distribution, and manufacturing facilities with a total floor area of 214,608 square-feet. There are no forest lands or timber lands located within or adjacent to the site. Furthermore, the site's existing zoning designation does not contemplate forest land or timber land uses. As a result, no impacts will occur.

- D.** *Would the project result in the loss of forest land or conversion of forest land to a non-forest use? • No Impact.*

No forest lands are located within the project site. The proposed use will be restricted to the site and will not affect any land under the jurisdiction of the Bureau of Land Management (BLM). As a result, no loss or conversion of forest lands to urban uses will result from the proposed project's implementation.

- E.** *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to a non-forest use? • No Impact.*

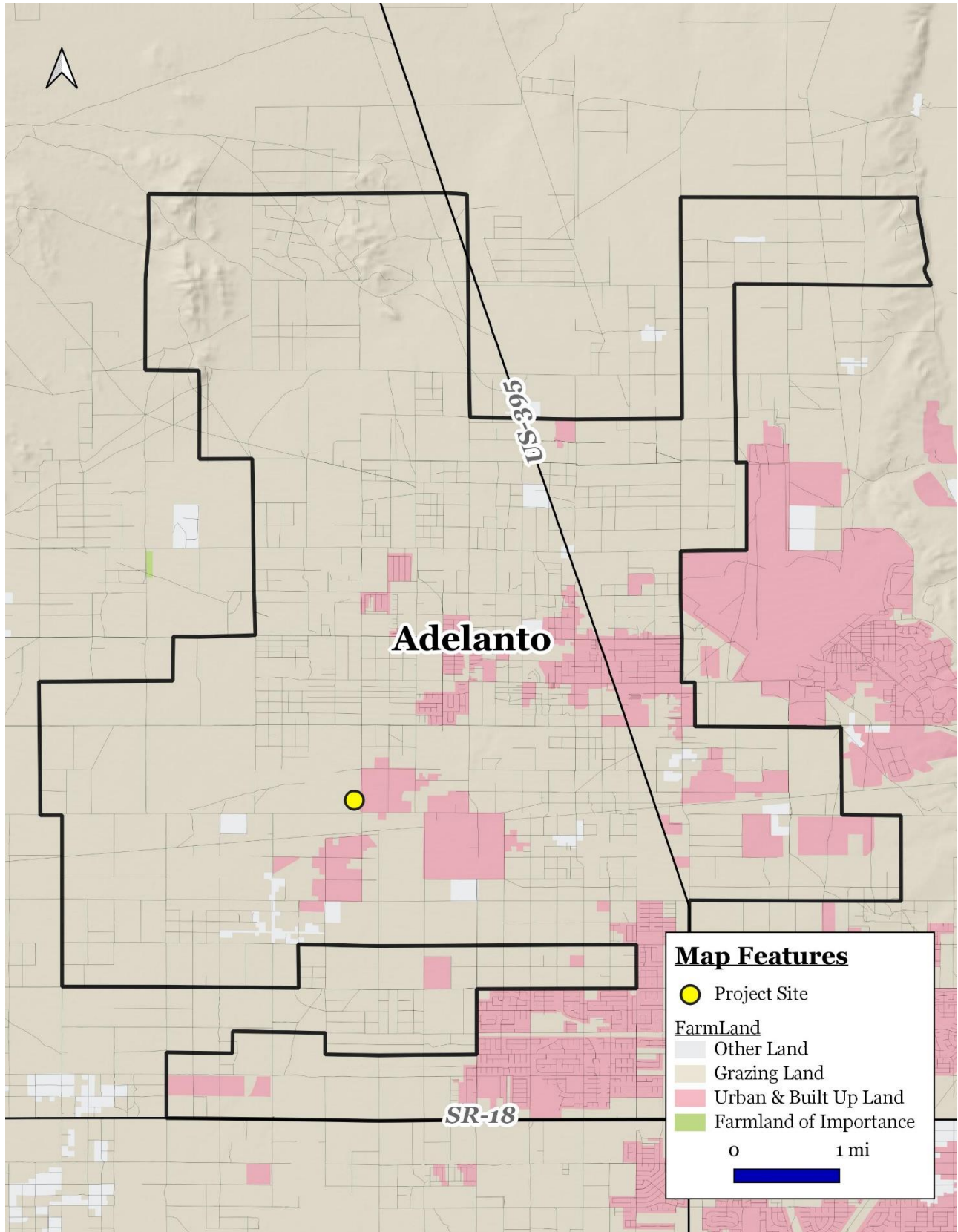
The project would not involve the disruption or damage of the existing environment that would result in a loss of farmland to nonagricultural use or conversion of forest land to non-forest use. As a result, no farmland conversion impacts will occur with the implementation of the proposed project.

## **MITIGATION MEASURES**

The analysis of agricultural and forestry resources indicated that no impact on these resources would occur as part of the proposed project's implementation. As a result, no mitigation is required.

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<sup>17</sup> California Department of Conservation. *State of California Williamson Act Contract Land*.



**EXHIBIT 3-1**  
**AGRICULTURE MAP**  
SOURCE: DEPARTMENT OF CONSERVATION

### 3.3 AIR QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project conflict with or obstruct implementation of the applicable air quality plan?				✗
B. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?			✗	
C. Would the project expose sensitive receptors to substantial pollutant concentrations?				✗
D. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?		✗		

#### ANALYSIS OF ENVIRONMENTAL IMPACTS

##### A. *Would the project conflict with or obstruct implementation of the applicable air quality plan?* • *No Impact.*

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The project site is currently vacant and undeveloped and contains a disturbed creosote bush community that supports vegetation such as Nevada joint fir, silver cholla, Joshua tree, rubber rabbitbrush, California buckwheat, and paper bag plant. The site has exhibited considerable human disturbance including illegal dumping and off-road activities. The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>18</sup>

Air quality impacts may occur during the construction or operation of a project, and may come from stationary (e.g., industrial processes, generators), mobile (e.g., automobiles, trucks), or area (e.g., residential water heaters) sources. The City is located within the Mojave Desert Air Basin (MDAB) and is under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). The district covers the majority of the MDAB. The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. The MDAB is separated from the southern California coastal and central California valley regions by mountains (highest elevation approximately 10,000 feet). The Antelope Valley is bordered in the northwest by the Tehachapi Mountains and in the south by the San Gabriel Mountains. The adjacent Mojave Desert is bordered in the southwest by the San Bernardino Mountains.<sup>19</sup>

<sup>18</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.

<sup>19</sup> Mojave Desert Air Quality Management District (MDAQMD). *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*. Report dated August 2016.

The Mojave Desert Air Quality Management District (MDAQMD) has established quantitative thresholds for short-term (construction) emissions and long-term (operational) emissions for the criteria pollutants listed below. Projects in the Mojave Desert Air Basin (MDAB) generating construction and operational-related emissions that exceed any of the following emissions thresholds are considered to be significant under CEQA.

- *Ozone ( $O_3$ )* is a nearly colorless gas that irritates the lungs, damages materials, and vegetation. Ozone is formed by photochemical reaction (when nitrogen dioxide is broken down by sunlight).
- *Carbon Monoxide ( $CO$ )* is a colorless, odorless toxic gas that interferes with the transfer of oxygen to the brain and is produced by the incomplete combustion of carbon-containing fuels emitted as vehicle exhaust. The threshold is 548 pounds per day of carbon monoxide ( $CO$ ).
- *Nitrogen Oxide ( $NO_x$ )* is a yellowish-brown gas, which at high levels can cause breathing difficulties.  $NO_x$  is formed when nitric oxide (a pollutant from burning processes) combines with oxygen. The daily threshold is 137 pounds per day of nitrogen oxide ( $NO_x$ ).
- *Sulfur Dioxide ( $SO_2$ )* is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Health effects include acute respiratory symptoms. The daily threshold is 137 pounds per day of sulfur oxides ( $SO_x$ ).
- *$PM_{10}$  and  $PM_{2.5}$*  refers to particulate matter less than ten microns and two and one-half microns in diameter, respectively. Particulates of this size cause a greater health risk than larger-sized particles since fine particles can more easily cause irritation. The daily threshold is 82 pounds per day of  $PM_{10}$  and 65 pounds per day of  $PM_{2.5}$ .
- *Reactive Organic Gasses (ROG)* refers to organic chemicals that, with the interaction of sunlight photochemical reactions may lead to the creation of “smog.” The daily threshold is 137 pounds per day of ROG.

Projects that are consistent with the projections of employment and population forecasts identified in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by SCAG are considered consistent with the MDAQMP growth projections, since the RTP/SCS forms the basis of the land use and transportation control portions of the MDAQMP. According to the Growth Forecast Appendix prepared by SCAG for the 2016-2040 RTP/SCS, the City of Adelanto is projected to add a total of 38,900 new residents and 3,900 new employees through the year 2040.<sup>20</sup> The proposed project will not introduce new residents and is anticipated to employ between 150 to 180 persons at full capacity. Therefore, the proposed project is not in conflict with the growth projections established for the City by SCAG. The project’s construction emissions would be below the thresholds of significance established by the MDAQMD (the project’s daily construction emissions are summarized in Table 3-1). In addition, the proposed project’s long-term (operational) airborne emissions will be below levels that the MDAQMD considers to be a significant impact (refer to Table 3-2). As a result, no conformity impacts will occur.

**B. Result in a cumulatively considerable net increase of any criteria pollutant for which the project**

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<sup>20</sup> Southern California Association of Governments. *Regional Transportation Plan/Sustainable Communities Strategy 2016-2040. Demographics & Growth Forecast.* April 2016.

*region is non-attainment under an applicable federal or state ambient air quality standard? • Less than Significant Impact.*

The existing parcel is vacant and undisturbed. According to the SCAQMD, any project is significant if it triggers or exceeds the SCAQMD daily emissions threshold identified previously and noted at the bottom of Tables 3-1 and 3-2. In general, a project will have the potential for a significant air quality impact if any of the following are met:

- Generates total emissions (direct and indirect) that exceeds the SCAQMD thresholds (the proposed project emissions are less than the thresholds as indicated in Tables 3-1 and 3-2);
- Results in a violation of any ambient air quality standard when added to the local background (the proposed project will not result, in any violation of these standards);
- Does not conform with the applicable attainment or maintenance plan(s) (the proposed project is in conformance with the City's Zoning and General Plan); and,
- Exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1 (the proposed project will not expose sensitive receptors to substantial pollutant concentrations nor is the site located near any sensitive receptors).

The construction for the current proposed project is assumed to commence in January 2023 and would take approximately nine months to complete.<sup>21</sup> The key construction phases are outlined in the paragraphs that follow.

- *Phase 1 Grading.* The project site would be graded and readied for the construction. The site would be graded to a depth of approximately 3-inches to 6-inches in depth. The typical heavy equipment used during this construction phase would include graders, bulldozers, offroad trucks, back-hoes, and trenching equipment. This phase would require one month to complete.
- *Phase 2 Site Preparation.* During this phase, the building footings, utility lines, and other underground infrastructure would be installed. The typical heavy equipment used during this construction phase would include bulldozers, offroad trucks, back-hoes, and trenching equipment. This phase would require one month to complete
- *Phase 3 Building Construction.* The new buildings would be constructed during this phase. The typical heavy equipment used during this construction phase would include offroad trucks, cranes, and fork-lifts. This phase will take approximately five months to complete
- *Phase 4 Paving and Finishing.* This concluding phase would involve the paving and finishing. The typical heavy equipment used during this construction phase would include trucks, backhoes, rollers, pavers, and trenching equipment. The completion of both phases will take approximately two months to complete.

The proposed project's construction and operation will not lead to a violation of the above-mentioned criteria. The analysis of daily construction and operational emissions was prepared utilizing the California

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<sup>21</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 5, 2021.



Emissions Estimator Model (CalEEMod V.2020.4.0). For air quality modeling purposes, a nine-month period of construction for all four phases were assumed. As shown in Table 3-1, daily construction emissions will not exceed the SCAQMD significance thresholds. The short-term construction emissions will be limited to those emissions generated during project construction.

**Table 3-1**  
**Estimated Daily Construction Emissions**

Construction Phase	ROG	NOx	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Site Preparation (on-site)	2.66	27.52	18.24	0.04	19.55	11.12
Site Preparation (off-site)	0.06	0.04	0.53	--	0.15	0.04
<b>Total Site Preparation</b>	<b>2.72</b>	<b>27.56</b>	<b>18.77</b>	<b>0.04</b>	<b>19.70</b>	<b>11.16</b>
Grading (on-site)	1.71	17.94	14.75	0.03	7.01	4.05
Grading (off-site)	0.05	0.03	0.44	--	0.12	0.03
<b>Total Grading</b>	<b>1.76</b>	<b>17.97</b>	<b>15.19</b>	<b>0.03</b>	<b>7.13</b>	<b>4.08</b>
Building Construction (on-site)	1.57	14.38	16.24	0.03	0.70	0.66
Building Construction (off-site)	0.38	1.44	3.25	0.01	0.99	0.28
<b>Total Building Construction</b>	<b>1.95</b>	<b>15.82</b>	<b>19.49</b>	<b>0.04</b>	<b>1.69</b>	<b>0.94</b>
Paving (on-site)	0.99	9.53	14.62	0.02	0.47	0.43
Paving (off-site)	0.05	0.03	0.41	--	0.12	0.03
<b>Total Paving</b>	<b>1.04</b>	<b>9.56</b>	<b>15.03</b>	<b>0.02</b>	<b>0.59</b>	<b>0.46</b>
Architectural Coating (on-site)	132.81	1.22	1.81	--	0.06	0.06
Architectural Coating (off-site)	0.06	0.03	0.49	--	0.15	0.04
<b>Total Architectural Coating</b>	<b>132.87</b>	<b>1.25</b>	<b>2.30</b>	<b>--</b>	<b>0.21</b>	<b>0.10</b>
<b>Maximum Daily Emissions</b>	<b>133.91</b>	<b>45.53</b>	<b>34.69</b>	<b>0.07</b>	<b>26.83</b>	<b>15.24</b>
<b>Daily Thresholds</b>	<b>137</b>	<b>137</b>	<b>548</b>	<b>137</b>	<b>82</b>	<b>65</b>
<b>Significant Impact?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: CalEEMod V.2020.4.0.

Long-term emissions refer to those air quality impacts that will occur once the proposed project has been constructed and is operational. These impacts will continue over the operational life of the project. The analysis of long-term operational impacts summarized in Table 3-2 also used the CalEEMod V.2020.4.0 computer model. The analysis summarized in Table 3-2 indicates that the operational (long-term) emissions will be below the SCAQMD daily emissions thresholds.

**Table 3-2**  
**Estimated Operational Emissions in lbs/day**

Emission Source	ROG	NOx	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area-wide (lbs/day)	5.96	--	0.02	0.00	--	--
Energy (lbs/day)	0.20	1.86	1.56	0.01	0.14	0.14
Mobile (lbs/day)	5.24	6.56	44.82	0.09	8.58	2.34
<b>Total (lbs/day)</b>	<b>11.40</b>	<b>8.43</b>	<b>46.41</b>	<b>0.10</b>	<b>8.72</b>	<b>2.48</b>
<b>Daily Thresholds</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Significant Impact?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: CalEEMod V.2020.4.0.

The analysis presented in Tables 3-1 and 3-2 reflect projected emissions that are typically higher during the summer months and represent a worse-case scenario. As indicated in Tables 3-1 and 3-2, the impacts are considered to be less than significant. In addition, the SCAQMD Rule Book contains numerous regulations governing various activities undertaken within the district. Among these regulations is Rule 403.2 – Fugitive Dust Control for the South Coast Planning Area, which was adopted in 1996 for the purpose of controlling fugitive dust. Adherence to Rule 403.2 regulations is required for all projects undertaken within the district. All internal roadways and parking areas will be paved. The adjacent roadways, Koala Road and Violet Road, must also be improved pursuant to the City’s requirements. Future construction truck drivers must also adhere to Title 13 - §2485 of the California Code of Regulations, which limits the idling of diesel-powered vehicles to less than five minutes.<sup>3</sup> Adherence to the aforementioned standard condition will minimize odor impacts from diesel trucks. Adherence to Rule 403 Regulations and Title 13 - §2485 of the California Code of Regulations will reduce potential impacts to levels that are less than significant.

**C. *Would the project expose sensitive receptors to substantial pollutant concentrations?* • No Impact.**

According to the MDAQMD, residences, schools, daycare centers, playgrounds, and medical facilities are considered sensitive receptor land uses. The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated: any industrial project within 1,000 feet; a distribution center (40 or more trucks per day) within 1,000 feet; a major transportation project within 1,000 feet; a dry cleaner using perchloroethylene within 500 feet; and a gasoline dispensing facility within 300 feet. The nearest sensitive receptor is 0.6 miles away and is classified as single family residential. Further northeast is residential land usage about 1.06 miles away. As a result, no impacts will occur.

**D. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?* • Less than Significant Impact with Mitigation.**

Cannabis cultivation directly impacts air quality in two (2) predominant operations, plant growth and extraction processes. Cannabis cultivation and, to a lesser degree, the manufacturing process, are often accompanied by the generation of strong odors. The majority of the odors of cannabis come from a class of chemicals called terpenes. Terpenes are among the most common compounds produced by flowering plants and vary widely between plants.<sup>22</sup> Cannabis produces over 140 different terpenes, and these chemicals are found in varying concentrations in different cannabis varieties. Tetrahydrocannabinol (THC), the cannabinoid primarily responsible for cannabis’ psychoactivity, has no odor whatsoever.

The type and potency of cannabis odors range widely from variety to variety, as do receptors’ opinions regarding whether the odor is pleasant or objectionable.<sup>2316</sup> The natural growth of the cannabis plants, and other processes at cultivation facilities, emit terpenes. Terpenes, known for their strong odor, are volatile organic compounds (VOCs). At facilities such as that being considered, the evaporation of solvents, and other processes in the production cycle also result in VOC emissions. The project Applicant will employ certain technologies that will be beneficial in controlling odors including the following:

- ***Carbon Filters.*** Also known as carbon scrubbers, carbon filters are historically one of the best methods for odor control. This type of filter uses pellets of charcoal to trap the terpenes. Carbon filters are simple to install, effective, and reliable. Carbon filters will be installed at key locations in

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<sup>20</sup> Cannabis Environmental Best Management Practices Draft Section for Review: Air Quality January 9, 2020.

the facility and will be monitored and replaced by staff on a regular basis. These carbon filters will also be effective in eliminating VOCs from the indoor air envelope.

- *Air Filters.* Standard air filters, also referred to as air purifiers, are typically made of densely woven fiber screens. These filters trap particles as air circulates through the filter, which can either be a stand-alone unit or incorporated into a ventilation system depending on the exact specifications.
- *Negative Ion Generators.* The machines will use a negative charge to attract positively charged particles in the air. This equipment will be installed in areas that do not interfere with the production activities but instead can proactively treat the air in order to meet regulations.
- *Air-tight Seals.* The proposed facility will utilize air-tight seals throughout the facility. Predominately used in the exhaust system, these airtight seals will be used in order to keep the exhaust system efficient and effective.
- *Negative Air Pressure.* The Applicant will make use of negative air pressure in order to retain odor for treatment. This will help to serve as a safeguard of odor escaping into the ambient air until it can be treated using the techniques above. GSC Holding Group, LLC. will seal the facility, except for the intake and exhaust, which creates suction when exhaust fans are turned off. The proper use of both negative air and negative ion generators will efficiently expunge odor before leaving the facilities.
- *Staff Training.* The facility's employees will be trained regarding compliance with the industry's best standards and facility regulations in order to achieve successful odor control. Employees will be trained in the use of odor control methods as well as any new techniques and technologies that may be added in the future.

The project Applicant will also be required to prepare an Odor Management Plan pursuant to San Bernardino County Department of Public Health construction guidelines. The following mitigation measures will be required to control odors and to ensure that the indoor air is safe for the workers:

- The Applicant will be required to prepare an Odor Management Plan that must be approved by the City of Adelanto and the San Bernardino County Department of Public Health. The Odor Management Plan must be approved prior to the issuance of an Occupancy Permit.
- Indoor air must be filtered to remove VOCs from the indoor air envelope. The filtration equipment must be installed prior to the issuance of an Occupancy Permit.

The above mitigation will reduce the potential impacts to levels that are less than significant.

## **MITIGATION MEASURES**

The analysis of air quality impacts indicated that the projected emissions would be below the SCAQMD's thresholds of significance. However, the following mitigation would be required to address potential odor impacts:

*Air Quality Mitigation Measure No. 1.* The Applicant will be required to prepare an Odor Management Plan that must be approved by the City of Adelanto and San Bernardino County Department of Public Health. The Odor Management Plan must be approved prior to the issuance of an Occupancy Permit.

*Air Quality Mitigation Measure No. 2.* Indoor air must be filtered so as to remove VOCs from the indoor air envelope. The filtration equipment must be installed prior to the issuance of an Occupancy Permit.

### 3.4 BIOLOGICAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
<b>A.</b> Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		✗		
<b>B.</b> Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				✗
<b>C.</b> Would the project have a substantial adverse effect on State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✗
<b>D.</b> Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites?				✗
<b>E.</b> Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		✗		
<b>F.</b> Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?				✗

### ANALYSIS OF ENVIRONMENTAL IMPACTS

- A.** *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? • Less than Significant Impact with Mitigation.*

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The site is approximately 895 meters above sea level and relatively flat with no slope and supports a moderately disturbed desert scrub habitat common in the region. The property consists of Helendale Bryman Loamy sand and Cajon sand with a 2 to 5 and 0 to 2 percent slope. Both have well drainage, with a moderate available water capacity, and no frequency of flooding. The vegetation community on site is creosote bush scrub habitat encompassing mainly native plants and some non-native grasses. The site is dominated by creosote bush (*Larrea tridentata*), Nevada jointfir (*Ephedra nevadensis*), kelch grass (*Schismus barbatus*), white bursage (*Ambrosia dumosa*), and Asian mustard (*Brassica tournefortii*). Section 5.0 provides a more detailed discussion of the various plant species observed during the surveys.

The site supports a variety of wildlife, with many of them being birds. One mammal was observed on site, the antelope ground squirrel (*Ammospermophilus leucurus*). Other mammals that are expected to occur include desert cottontails (*Sylvilagus audubonii*), California ground squirrel (*Otospermophilus beecheyi*), black-tailed jackrabbit (*Lepus californicus*), and coyote (*Canis latrans*). Birds observed included ravens (*Corvus corax*), white-crowned sparrow (*Zonotrichia leucophrys*), rock pigeon (*Columba livia*), and black throated sparrow (*Amphispiza bilineata*). Section 5.0 provides a more detailed discussion of the various species observed during the surveys. One reptile was observed during the survey, the common side-blotched lizard (*Uta stansburiana*). Other reptiles that may occur on the site include desert spiny lizard (*Sceloporus magister*), long nose leopard lizard (*Gambelia wislizenii*), and western whiptail lizard (*Cnemidophorus tigris*). Table 2 provides a compendium of wildlife species. In addition, no sensitive habitats (e.g., sensitive species critical habitats, etc.) have been documented in the immediate area according to the CNDDB (2021) and none were observed during the field investigations.

The site supports a slightly disturbed desert scrub plant community which sparsely covers the property (Figure 3). Species present on the site included kelch grass (*Schismus barbatus*), creosote bush (*Larrea tridentata*), Asian mustard (*Brassica tournefortii*), Western Joshua Tree (*Yucca brevifolia*), Nevada jointfir (*Ephedra nevadensis*), rubber rabbitbrush (*Ericameria nauseosa*), and fiddleneck (*Amsinckia tessellata*). Table 1 provides a compendium of all plants occurring on the site and/or in the immediate surrounding area. Birds observed included ravens (*Corvus corax*), white-crowned sparrow (*Zonotrichia leucophrys*), rock pigeon (*Columba livia*), and black throated sparrow (*Amphispiza bilineata*). One reptile was observed on the property being the common side-blotched lizard (*Uta stansburiana*). One mammal was observed on site, the Antelope ground squirrels (*Ammospermophilus leucurus*), although California ground squirrel (*Otospermophilus beecheyi*), black-tailed jackrabbit (*Lepus californicus*), desert cottontails (*Sylvilagus audubonii*) and Merriam's kangaroo rats (*Dipodomys merriami*) may also occur on the site given their wide-spread distribution in the region. Tables 1 and 2 (Appendix A) provides a compendium of the various plant and animal species identified during the field investigations of the biology report and those common to the area. No distinct wildlife corridors were identified on the site or in the immediate area. No sensitive habitats (e.g., wetlands, vernal pools, critical habitats for sensitive species, etc.) were observed on the site during the field investigations. The following are the listed and special status species that have the ability to occur on the project site. It is not a comprehensive list of all the species in the quad. This information has been taken from the California Natural Diversity Database and is using the most current version.

The proposed project involves the construction of six, two-story cannabis cultivation, distribution, and manufacturing facilities with a total floor area of 97,428 square-feet. The property currently has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>24</sup> The proposed project site is located on a 3.05-acre parcel that is currently vacant and undisturbed. A literature search was performed on the CDFW's Natural Diversity Data Base (CNDDB) for the Adelanto, California USGS 7.5-minute quadrangle to determine the special-status species recorded in the area. Currently, there are seven wildlife species considered of special concern status in the Adelanto USGS quadrangle. These species include northern harrier, loggerhead shrike, Le Conte's thrasher, burrowing owl, southern grasshopper mouse, American badger, coast horned lizard, and prairie falcon. Implementing Biological Resources Mitigations 1,2 and 3 would reduce impacts to candidate special-status species and special status species to be less than significant with mitigations incorporated. The site contains a disturbed creosote bush community that supports vegetation such as Nevada joint fir, silver cholla, Joshua tree, rubber rabbitbrush, California buckwheat, and paper bag plant. On September 22, 2020, CDFW has listed the western Joshua Tree as a temporary endangered candidate for one year until a final decision is made and is therefore illegal to remove

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<sup>24</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2, June 22, 2021.*

or transplant a tree without an approved Incidental Take Permit (ITP) provided by CDFW. The Joshua Tree is also a protected plant in the County of San Bernardino under the Native Desert Plant Protection Plan (Ordinance Chapter 88.01.060). There are Joshua trees on the property. Construction activities, including grading, vehicle access, equipment staging area, development of access roads and construction-related activities have the potential to result in temporary impacts to desert flora within the project.

The closest desert tortoise reported near site was four miles southeast in 2007, and the closest burrowing owl sighting was reported 3 miles east of the site in 2007. No Mojave ground squirrels were detected on the site, although there are suitable burrows, the most recent sighting occurred three miles northwest in 2011, the species is not expected to occur on site due to urbanization expansion. Mitigation measures 1, 2, and 3 would reduce the impact to species as a candidate sensitive, or special status to less than significant.

**B.** *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? • No Impact.*

The western portion of the site is traversed by an intermittent stream channel that *is not* classified as a “Water of the U.S” by the U.S. Army Corps of Engineers. The stream designation is SPL-2017-00143. According to the EPA’s database, this stream *is not* classified as a “Water of the U.S.” The streambed was last considered by the Army Corps of Engineers on July 19, 2017. “Waters of the United States” is a threshold term in the Clean Water Act (CWA) and establishes the scope of federal jurisdiction under the Act. The CWA does not define “waters of the United States”; rather, it provides discretion for EPA and the U.S. Department of the Army (i.e., Army Corps of Engineers) to define “Waters of the United States” in regulations. If a stream is classified as a “Water of the United States,” a streambed alteration permit or a Section 404 Permit would be required. This permit is designed to regulate the discharge of dredged or fill material into waters of the United States, including wetlands. The eroded channel is dry and does not include any unique riparian or wetlands vegetation though the concentration of creosote habitat and Joshua trees are more pronounced along the drainage course compared to other areas within the site. The site plan indicates that an 80-foot-wide drainage easement will be located along the project site’s westerly side. No buildings or other improvements will be located within this easement. As a result, the potential impacts will be less than significant.<sup>18</sup> No offsite wetland or migratory bird nesting areas will be affected by the proposed development since all development will be confined to the project site. As a result, no impacts are anticipated.

**C.** *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? • No Impact.*

No wetland areas or riparian habitats (e.g., wetlands, vernal pools, critical habitats for sensitive species, etc.) were observed on the site during the field investigations.<sup>19</sup> The site in its entirety is undeveloped and undisturbed. As a result, no impacts are anticipated.

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<sup>19</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 5, 2021.

- D.** *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites? • No Impact.*

The site's utility as a habitat and a migration corridor is constrained by the presence of an adjacent roadway and the development that is present in the neighboring areas. As a result, no impacts are anticipated.

- E.** *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? • Less than Significant Impact with Mitigation*

Joshua Trees are protected under Chapter 17.57 – Biotic Resources of the City of Adelanto's Municipal Code. In addition, the City of Adelanto enforces Title 8, Division 9 of San Bernardino County Code, which requires that every Joshua Tree proposed for removal be inspected by the City to assure the Joshua tree is not a "specimen" class tree requiring preservation and transplantation. Joshua trees occur throughout the Mojave Desert in Southern California and are typically found at an elevation of 1,200 to 5,400 feet. The California Department of Fish and Wildlife consider Joshua tree woodlands as areas that support relatively high species diversity and as such are considered to be a sensitive desert community. Joshua trees are also considered a significant resource under the California Environmental Quality Act (CEQA) and are included in the Desert Plant Protection Act, Food, and Agricultural Code (80001 – 80006). There are Joshua Trees located within the site. As a result, the proposed project will be required to implement Mitigation Measure No. 4

- E.** *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? • No Impact.*

No wetland areas or riparian habitats (e.g., wetlands, vernal pools, critical habitats for sensitive species, etc.) were observed on the site during the field investigations.<sup>19</sup> The site in its entirety is undeveloped and undisturbed. As a result, no impacts are anticipated.

- F.** *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites? • No Impact.*

The site's utility as a habitat and a migration corridor is constrained by the presence of an adjacent roadway and the development that is present in the neighboring areas. As a result, no impacts are anticipated.

- E.** *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? • Less than Significant Impact with Mitigation*

Joshua Trees are protected under Chapter 17.57 – Biotic Resources of the City of Adelanto's Municipal Code. In addition, the City of Adelanto enforces Title 8, Division 9 of San Bernardino County Code, which requires that every Joshua Tree proposed for removal be inspected by the City to assure the Joshua tree is not a "specimen" class tree requiring preservation and transplantation. Joshua trees occur throughout the Mojave Desert in Southern California and are typically found at an elevation of 1,200 to 5,400 feet. The California Department of Fish and Wildlife consider Joshua tree woodlands as areas that support relatively

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<sup>19</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 5, 2021.



high species diversity and as such are considered to be a sensitive desert community. Joshua trees are also considered a significant resource under the California Environmental Quality Act (CEQA) and are included in the Desert Plant Protection Act, Food, and Agricultural Code (80001 – 80006). There are Joshua Trees located within the site. As a result, the proposed project will be required to implement Mitigation Measure No. 4. Adherence the aforementioned mitigation will reduce the project's impacts to levels that are less than significant.

- F.** *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*
- *No Impact.*

The proposed project's implementation would not be in conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans. As a result, no impacts are anticipated.

## **MITIGATION MEASURES**

The analysis of biological impacts determined that the following mitigation measures would be required to reduce the project's impacts to levels that would be less than significant.

*Biological Resources Mitigation Measure No. 1.* If construction occurs during the non-nesting season (typically September 16 through December 31), a pre-construction sweep shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity sweep within the Project areas (including access routes) and a 300-foot buffer surrounding the Project areas, within 2 hours prior to initiating Project activities. If project activities are planned during bird nesting season (generally, raptor nesting season is January 1 through September 15; and passerine bird nesting season is February 1 through September 1, a nesting bird survey shall be conducted by a qualified biologist within no more than three (3) days prior to the initiation of project activities, including, but not limited to clearing, grubbing, and/or rough grading to prevent impacts to birds and their nests. If nesting bird activity is present, a no disturbance buffer zone shall be established by the qualified biologist around each nest. The buffer shall be a minimum of 300 feet for raptors and 100 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. If there is no nesting activity, then no further action is need for this measure.

*Biological Resources Mitigation Measure No. 2.* Prior to grading or any other ground-disturbing activity, a pre-construction burrowing owl clearance survey must be conducted in accordance with the Staff Report on Burrowing Owl Mitigation, State of California Natural Resource Agency, Department of Fish and Game, May 7, 2012, by a qualified biologist within 14 days prior to the beginning of project activities a secondary survey must be conducted by a qualified biologist within 24 hours prior to the beginning of project construction to determine if the project site contains burrowing owl or sign thereof to avoid any potential impacts to the species. The surveys shall include 100 percent coverage of the project site. If both surveys reveal no burrowing owls are present or sign thereof, no additional actions related to this measure are required and a letter shall be prepared by the qualified biologist documenting the results of the survey. The letter shall be submitted to CDFW prior to construction. If occupied active burrows or sign thereof are found within the development footprint during the pre-construction clearance survey, Biological Resources Mitigation Measure 3 shall also apply.

*Biological Resources Mitigation Measure No. 3.* If active burrows or signs thereof are found within the development footprint during the pre-construction clearance surveys, site-specific non-disturbance buffer zones shall be established by the qualified biologist shall be no less than 300 feet. If determined appropriate, a smaller buffer may be established by the qualified biologist following monitoring and assessments of the Project's effects on the burrowing owls. If it is not possible to avoid active burrows, passive relocation shall be implemented if a qualified biologist has determined there are no nesting owls and/or juvenile owls are no longer dependent on the burrows. A qualified biologist, in coordination with the applicant and the City, shall prepare and submit a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the CDFW's Staff Report on Burrowing Owl Mitigation (CDFG 2012) for CDFW review/approval prior to the commencement of disturbance activities onsite and proposed mitigation for permanent loss of occupied burrow(s) and habitat consistent with the 2012 Staff Report on Burrowing Owl Mitigation. When a qualified biologist determines that burrowing owls are no longer occupying the Project site and passive relocation is complete, construction activities may begin. A final letter report shall be prepared by the qualified biologist documenting the results of the passive relocation. The letter shall be submitted to CDFW.

As of September 22, 2020, the California Department of Fish and Wildlife temporarily listed the western Joshua Tree (*Yucca brevifolia*) as an endangered species for one year until a final decision is made in 2021. Therefore, any attempt to remove a Joshua tree or part of a Joshua tree, dead or alive from its current position will require an Incidental Take Permit (ITP). As a result, the proposed project will be required to implement the following mitigation measure.

*Biological Resources Mitigation Measure No. 4.* The project Applicant will be required to obtain a California Endangered Species Act (CESA) Incidental Take Permit (ITP) from the State of California Department of Fish and Wildlife (CDFW) related to the removal, replanting or any development activity that may affect the Joshua Trees located on-site. around each western Joshua tree parent, seedling, and sprout. No project activities may occur within the buffer. Should avoidance be infeasible (during candidacy or if the species is listed under CESA), CDFW recommends that the Project Proponent apply for an Incidental Take Permit from CDFW prior to initiating Project activities.

CDFW has concerns that the Project is within the range of the CESA threatened Mohave ground squirrel (MGS), and the ISMND confirms the presence of burrows suitable for the species. However, the ISMND does not anticipate the presence of Mohave ground squirrel due to urbanization. Because CDFW is aware of an occurrence of Mohave ground squirrel in 2020 in the vicinity of the Project, just north of the Southern California Logistics Airport, CDFW is concerned that surveys were not performed to confirm presence. Therefore, CDFW recognizes the potential for Mohave ground squirrel at the start of construction and recommends pre-construction Mohave ground squirrel surveys and observations and requests the City adopt the following mitigation measures:

*Biological Resources Mitigation Measure No. 5.* Pre-construction surveys following the Mohave Ground Squirrel Survey Guidelines (CDFG 2010) or most recent version shall be performed by a qualified biologist authorized by a Memorandum of Understanding issued by CDFW. The pre-construction surveys shall cover the Project Area and a 50-foot buffer zone. Should Mohave ground squirrel presence be confirmed during the survey, the Project Proponent should obtain an ITP for Mohave ground squirrel prior to the start of Project activities. CDFW shall be notified if Mohave ground squirrel presence is confirmed during the pre-construction survey. If a Mohave ground squirrel is observed during Project activities, and the Project Proponent does not have an ITP, all work shall immediately stop, and the observation shall be immediately reported to CDFW.

Desert Tortoise is a state-threatened, proposed endangered species, as such CDFW is concerned that the ISMND lacks a mitigation measure for pre-construction desert tortoise surveys, because the Project site is within the desert tortoise range and contains suitable habitat for desert tortoise: creosote bush scrub. To address potential direct/indirect impacts to desert tortoise, CDFW recommends the inclusion of the following mitigation measure prior to the City adopting the ISMND:

*Biological Resources Mitigation Measure No. 6.* A CDFW-approved biologist shall conduct a protocol level presence or absence survey within the Project area and 50-foot buffer no more than 48 hours prior to Project activities during desert tortoise active season (April to May or September to October), in accordance with the U.S. Fish and Wildlife Service 2019 desert tortoise survey methodology. The survey shall utilize perpendicular survey routes and 100-percent visual coverage for desert tortoise and their sign. Results of the survey shall be submitted to CDFW. If the survey confirms absence, the CDFW-approved biologist shall ensure desert tortoise do not enter the Project area. If the survey confirms presence, the Project proponent shall submit to CDFW for review and approval a desert tortoise-specific avoidance plan detailing the protective avoidance measures to be implemented to ensure complete avoidance of take to desert tortoise. If complete avoidance cannot be achieved, CDFW recommends Project proponent not undertake Project activities and Project activities be postponed until appropriate authorization (i.e., CESA ITP under Fish and Game Code section 2081) is obtained.

CDFW recommends that prior to adopting the ISMND, the City complete focused surveys following accepted protocol/methods and updates the ISMND to reflect the survey results and any changes in mitigation to address Project impacts. CDFW recommends the below measure be added to the ISMND to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts. If species are documented on-site during surveys and avoidance is infeasible, to adequately offset impacts, CDFW recommends the City considers purchasing credits from a mitigation bank or acquiring and conserving in perpetuity lands with the target resources.

*Biological Resources Mitigation Measure No. 7.* Prior to Project implementation, and during the appropriate season, the City shall conduct botanical field survey following protocols set forth in the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). The surveys shall be conducted by a CDFW-approved botanist(s) experienced in conducting floristic botanical field surveys, knowledgeable of plant taxonomy and plant community ecology and classification, familiar with the plants of the area, including special status and locally significant plants, and familiar with the appropriate state and federal statutes related to plants and plant collecting. The botanical field surveys shall be conducted at the appropriate time of year when plants will both be evident and identifiable (usually, during flowering or fruiting) and, in a manner, which maximizes the likelihood of locating special status plants and sensitive natural communities that may be present. Botanical field surveys shall be conducted floristic in nature, meaning that every plant taxon that occurs in the project area is identified to the taxonomic level necessary to determine rarity and listing status. If any rare plants or sensitive vegetation communities are identified, the City shall either avoid the occurrence, with an appropriate buffer, or mitigate the loss of the occurrence through the purchase of mitigation credits from a CDFW-approved bank or land acquisition and conservation at a minimum 3:1 (replacement-to-impact) ratio. Note that a higher ratio may be warranted if the proposed mitigation lands are located far away from the Project site (i.e., within a separate watershed) or is not occupied by or available to special status species. If the Project has the potential to impact a State-listed species, the City should apply for a California Endangered Species Act Incidental Take Permit with the California Department of Fish and Wildlife.

Based on review of aerial photography from the California State Water Resources Control Board, at least two ephemeral drainage features, merging into one, traverse the central portion of the Project site. The California Department of Cannabis Control (DCC) requires cannabis cultivators to demonstrate compliance with Fish and Game Code section 1602 prior to issuing a cultivation license (Business and Professions Code, § 26060.1). To qualify for an Annual License from DCC, cultivators must have an LSA Agreement or written verification from CDFW that one is not needed. Cannabis cultivators may apply online for an LSA Agreement through the Environmental Permit Information Management System (EPIMS; <https://epims.wildlife.ca.gov>). Cannabis cultivators may learn more about cannabis cultivation permitting at <https://wildlife.ca.gov/Conservation/Cannabis/Permitting>. CDFW recommends MM No. 8 below, considering CDFW's role in cannabis permitting:

*Biological Resources Mitigation Measure No. 8.* Prior to construction and issuance of any grading permit, the Project applicant should obtain written correspondence from the California Department of Fish and Wildlife (CDFW) stating that notification under section 1602 of the Fish and Game Code is not required for the Project, or the Project applicant should obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.

Cannabis cultivation sites (whether indoor or outdoor) often use substantial quantities of pesticides, including fungicides, herbicides, insecticides, and rodenticides. Wildlife, including beneficial arthropods, birds, mammals, amphibians, reptiles, and fish, can be poisoned by pesticides after exposure to a toxic dose through ingestion, inhalation, or dermal contact (Fleischli et al. 2004, Pimentel 2005, Berny 2007). They can also experience secondary poisoning through feeding on animals that have been directly exposed to the pesticides. (Even if used indoors, rodenticides may result in secondary poisoning through ingestion of sickened animals that leave the premises or ingestion of lethally poisoned animals disposed of outside.) Nonlethal doses of pesticides can negatively affect wildlife; pesticides can compromise immune systems, cause hormone imbalances, affect reproduction, and alter growth rates of many wildlife species. CDFW recommends that the City include a mitigation measure conditioning the Project to develop a plan to avoid, minimize, and mitigate the impacts of pesticides used in cannabis cultivation. CDFW recommends inclusion of the following mitigation measure focused on avoiding impacts to biological resources:

*Biological Resources Mitigation Measure No. 9.* Prior to construction and issuance of any grading permit, the City of Adelanto shall develop a plan with measures to avoid, minimize, or mitigate the impacts of pesticides used in cannabis cultivation, including fungicides, herbicides, insecticides, and rodenticides. The plan should include, but is not limited to, the following elements: (1) Proper use, storage, and disposal of pesticides, in accordance with manufacturers' directions and warnings. (2) Avoidance of pesticide use where toxic runoff may pass into waters of the State, including ephemeral streams. (3) Avoidance of pesticides that cannot legally be used on cannabis in the state of California, as set forth by the Department of Pesticide Regulation. (4) Avoidance of anticoagulant rodenticides and rodenticides with "flavorizers." (5) Avoidance of sticky/glue traps. (6) Inclusion of alternatives to toxic rodenticides, such as sanitation (removing food sources like pet food, cleaning up refuse, and securing garbage in sealed containers) and physical barriers.

Cannabis cultivation operations often use artificial lighting or "mixed-light" techniques in greenhouse structures and indoor operations to increase yields. If not disposed of properly, these lighting materials pose significant environmental risks because they contain mercury and other toxins (O'Hare et al. 2013). In addition to containing toxic substances, artificial lighting often results in light pollution, which has the potential to significantly and adversely affect fish and wildlife. Night lighting can disrupt the circadian rhythms of many wildlife species. Many species use photoperiod cues for communication (e.g., birdsong;

Miller 2006), determining when to begin foraging (Stone et al. 2009), behavioral thermoregulation (Beiswenger 1977), and migration (Longcore and Rich 2004). Phototaxis, a phenomenon that results in attraction and movement toward light, can disorient, entrap, and temporarily blind wildlife species that experience it (Longcore and Rich 2004). The ISMND indicates that Project activities will involve glass or translucent plastic on building roofs and gables for greenhouses to allow natural daylight use. Because of the potential for artificial light to impact nocturnal wildlife species and migratory birds that fly at night, CDFW recommends the following mitigation measure:

*Biological Resources Mitigation Measure No. 10.* Light shall not be visible outside of any structure used for cannabis cultivation. This shall be accomplished by: employing blackout curtains where artificial light is used to prevent light escapement, eliminating all nonessential lighting from cannabis sites and avoiding or limiting the use of artificial light during the hours of dawn and dusk when many wildlife species are most active, ensuring that lighting for cultivation activities and security purposes is shielded, cast downward, and does not spill over onto other properties or upward into the night sky (see the International Dark-Sky Association standards at <http://darksky.org/>), and using LED lighting with a correlated color temperature of 3,000 Kelvins or less. All hazardous waste associated with lighting shall be disposed of properly and lighting that contains toxic compounds shall be recycled with a qualified recycler.

Construction and operation of cannabis facilities may result in a substantial amount of noise through road use, equipment, and other project-related activities. This may adversely affect wildlife species in several ways as wildlife responses to noise can occur at exposure levels of only 55 to 60 decibels (Barber et al. 2009). (For reference, normal conversation is approximately 60 decibels, and natural ambient noise levels [e.g., forest habitat] are generally measured at less than 50 decibels.). Anthropogenic noise can disrupt the communication of many wildlife species including frogs, birds, and bats (Sun and Narins 2005, Patricelli and Blickley 2006, Gillam and McCracken 2007, Slabbekoorn and Ripmeester 2008). Noise can also affect predator-prey relationships as many nocturnal animals such as bats and owls primarily use auditory cues (i.e., hearing) to hunt. Additionally, many prey species increase their vigilance behavior when exposed to noise because they need to rely more on visual detection of predators when auditory cues may be masked by noise (Rabin et al. 2006, Quinn et al. 2017). Noise has also been shown to reduce the density of nesting birds (Francis et al. 2009) and cause increased stress that results in decreased immune responses (Kight and Swaddle 2011). Considering the above, CDFW recommends MM No. 11 below to restrict the use of equipment to hours least likely to disrupt wildlife and to suppress device noise.

*Biological Resources Mitigation Measure No. 11.* Project construction shall not occur during the hours of dawn and dusk when many wildlife species are most active. To suppress Project noise, the Project shall implement the use of mufflers and all generators shall be enclosed.

### 3.5 CULTURAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the CEQA Guidelines?				✗
B. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines?		✗		
C. Would the project disturb any human remains, including those interred outside of formal cemeteries?			✗	

#### ANALYSIS OF ENVIRONMENTAL IMPACTS

**A.** *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the CEQA Guidelines?* • No Impact.

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The project site is currently vacant and undeveloped and contains a disturbed creosote bush community that supports vegetation such as Nevada joint fir, silver cholla, Joshua tree, rubber rabbitbrush, California buckwheat, and paper bag plant. The site has exhibited considerable human disturbance including illegal dumping and off-road activities. The western portion of the site is traversed by an intermittent stream channel, designated as SPL-2017-00143. According to the EPA's database, this stream is *not* classified as a "Water of the U.S." by the U.S. Army Corps of Engineers. The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>25</sup>

Historic structures and sites are defined by local, State, and Federal criteria. A site or structure may be historically significant if it is locally protected through a General Plan or historic preservation ordinance. In addition, a site or structure may be historically significant according to State or Federal criteria even if the locality does not recognize such significance. To be considered eligible for the National Register, a property's significance may be determined if the property is associated with events, activities, or developments that were important in the past, with the lives of people who were important in the past, or represents significant architectural, landscape, or engineering elements. Specific criteria include the following:

<sup>25</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.

- Districts, sites, buildings, structures, and objects that are associated with the lives of significant persons in or past;
- Districts, sites, buildings, structures, and objects that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or,
- Districts, sites, buildings, structures, and objects that have yielded or may be likely to yield, information important in history or prehistory.

Ordinarily, properties that have achieved significance within the past 50 years are not considered eligible for the National Register. However, such properties *will qualify* if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- A religious property deriving primary significance from architectural or artistic distinction or historical importance;
- Districts, sites, buildings, structures, and objects that are associated with events that have made a significant contribution to the broad patterns of our history;
- A building or structure removed from its original location that is significant for architectural value, or which is the surviving structure is associated with a historic person or event;
- A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life;
- A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events;
- A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;
- A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,
- A property achieving significance within the past 50 years if it is of exceptional importance.<sup>26</sup>

The State has established *California Historical Landmarks* that include sites, buildings, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. *California Points of Historical Interest* has a similar definition, except they are deemed of local significance. A search of the National

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<sup>26</sup> U. S. Department of the Interior, National Park Service. National Register of Historic Places. 2021.

Register of Historic Places and the list of California Historical Resources was conducted, and it was determined that no historic resources were listed within the City of Adelanto.<sup>27</sup>

The proposed project will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Furthermore, the project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO).<sup>28</sup> The proposed project will be limited to the project site and will not affect any structures or historical resources listed on the National or State Register or those identified as being eligible for listing on the National or State Register. Furthermore, the project site is not present on the list of historic resources identified by the State Office of Historic Preservation (SHPO).<sup>22</sup> The project site is vacant and undisturbed though the developments in surrounding areas do not have any historical or cultural significance. Since the project's implementation will not impact any Federal, State, or locally designated historic resources, no impacts will occur.

**B. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines? • Less than Significant Impact with Mitigation.***

An intensive-level cultural resources field survey of the subject property was conducted on January 5, 2022. The survey was conducted by walking parallel transects spaced approximately 10-15 meters apart across 100 percent of the subject property. Digital photographs were taken at various points within the subject property boundaries, including overviews as well as detail photographs of field conditions. Hand-held Global Positioning Systems (GPS) were available for mapping purposes. The records search revealed that 10 cultural resources studies have taken place resulting in the recording of two cultural resources within one half-mile of the project site. The project site has been subject to one previous cultural resources assessment and no cultural resources have been previously recorded within its boundaries. A summary of the records search is included below, and the records search bibliography is provided in Appendix A of the cultural resources report. The project site exhibited approximately 90 percent surface visibility. Disturbances related to sheet washing and rilling were evident. The project site exhibits a northerly aspect and runoff flows towards intermittent drainages and eventually into the Fremont Wash, located approximately five miles to the northwest. Soils include sandy silt, and vegetation includes creosote scrub, Joshua trees, and mixed seasonal grasses. No cultural resources of any kind were identified.

No signs of human habitation nor any cemeteries are apparent within or near the project, and no signs of development on the parcel appear on any historic aerial map reviewed, nor on later USGS maps. Since it is possible that previously unrecognized resources could exist at the site, the proposed project would be required to adhere to Cultural Resources Mitigation Measures 1, 2, 3 and 4. As part of the AB-52 consultation, the San Manuel Band of Mission Indians (SMBMI) reviewed the project and had the following comments. The proposed project area exists within Serrano ancestral territory and, therefore, is of interest to the Tribe. However, due to the nature and location of the proposed project, and given the CRM Department's present state of knowledge, SMBMI does not have any concerns with the project's

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<sup>27</sup> U. S. Department of the Interior, National Park Service. *National Register of Historic Places*. Secondary Source: California State Parks, Office of Historic Preservation. *Listed California Historical Resources*. Website accessed August 16, 2021.

<sup>28</sup> California Department of Parks and Recreation. *California Historical Resources*. Website accessed on August 16, 2021.



implementation, as planned, at this time. As a result, SMBMI requests that the following language be made a part of the project/permit/plan conditions:

1. In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed within TCR-1, regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.
2. If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to SMBMI for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.
3. If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

#### Tribal Cultural Resources Mitigation Measures

1. The San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed in CR-1, of any pre-contact and/or historic-era cultural resources discovered during project implementation and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with SMBMI, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents SMBMI for the remainder of the project, should SMBMI elect to place a monitor on-site.
2. Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to SMBMI. The Lead Agency and/or applicant shall, in good faith, consult with SMBMI throughout the life of the project.

**C. *Would the project disturb any human remains, including those interred outside of formal cemeteries?***  
• *Less than Significant Impact.*

There are no dedicated cemeteries located in the vicinity of the project site.<sup>29</sup> The proposed project will be restricted to the project site and therefore will not affect any dedicated cemeteries in the vicinity.

Notwithstanding, the following mitigation is mandated by the California Code of Regulations (CCR) Section 15064.5(b)(4):

“A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures.”

Additionally, Section 5097.98 of the Public Resources Code states:

“In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with (b) Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.”

Adherence to the aforementioned standard condition will ensure potential impacts remain at levels that are less than significant.

## **MITIGATION MEASURES**

The following mitigation measures will be required to address potential cultural resources impacts:

*Cultural Resources Mitigation Measure No. 1.* Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City of Adelanto that a qualified archaeologist/paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.

*Cultural Resources Mitigation Measure No. 2.* The archaeologist/paleontologist monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at or below four (4) feet below ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The archaeologist/paleontologist monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified archaeologist/paleontologist personnel to have a low potential to contain or yield fossil

resources.

*Cultural Resources Mitigation Measure No. 3.* Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.

*Cultural Resources Mitigation Measure No. 4.* A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Adelanto prior to building final.

As part of the AB-52 consultation, the San Manuel Band of Mission Indians (SMBMI) reviewed the project and had the following comments. The proposed project area exists within Serrano ancestral territory and, therefore, is of interest to the Tribe. However, due to the nature and location of the proposed project, and given the CRM Department's present state of knowledge, SMBMI does not have any concerns with the project's implementation, as planned, at this time. As a result, SMBMI requests that the following language be made a part of the project/permit/plan conditions:

*Cultural Resources Mitigation Measure No.5.* In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted.

*Cultural Resources Mitigation Measure No. 6.* If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to SMBMI for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

*Cultural Resources Mitigation Measure No. 7.* If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

*Cultural Resources Mitigation Measure No. 8.* The San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed in the mitigation measure, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with

SMBMI, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents SMBMI for the remainder of the project, should SMBMI elect to place a monitor on-site.

*Cultural Resources Mitigation Measure No. 9.* Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to SMBMI. The Lead Agency and/or applicant shall, in good faith, consult with SMBMI throughout the life of the project.

### 3.6 ENERGY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?		✗		
B. Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?			✗	

#### ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation? • Less than Significant Impact with Mitigation.*

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The project site is currently vacant and undeveloped and contains a disturbed creosote bush community that supports vegetation such as Nevada joint fir, silver cholla, Joshua tree, rubber rabbitbrush, California buckwheat, and paper bag plant. The site has exhibited considerable human disturbance including illegal dumping and off-road activities. The western portion of the site is traversed by an intermittent stream channel, designated as SPL-2017-00143. According to the EPA's database, this stream *is not* classified as a "Water of the U.S." by the U.S. Army Corps of Engineers. The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>30</sup>

The growing (cultivation) of cannabis is an agricultural production process where the environmental conditions, temperature, and humidity are tightly controlled to optimize the quality of the cannabis plants and to reduce crop loss. The quality and amount of light provided is the primary variable affecting crop yield and quality once air temperature and humidity needs are met. Dehumidification is generally achieved mechanically by sub-cooling the air to remove water and then reheating the air to the desired supply air temperature through traditional dehumidification units or by absorbing moisture in the air through a desiccant dehumidifier. The indoor air conditioning will also involve electrical consumption.

For indoor grow operations (as opposed to greenhouse operations), LED lighting fixtures are being successfully applied to vegetative rooms, saving up to 50% of the lighting energy compared to the standard practice. For flower rooms, double ended, high-pressure sodium (HPS) fixtures save 20-25% compared to the standard HPS fixtures. While less common, some growers are successfully applying LED fixtures or

<sup>30</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.

LED/HPS hybrid designs for up to 30-40% energy savings in flower rooms. For cooling and dehumidification, smaller grow operations are saving energy by using split ductless air conditioning units in place of standard rooftop units. Medium and large-sized grow operations are using chilled water systems to accomplish both cooling and dehumidification, with energy savings of up to 40% compared to the standard practice. By implementing all these best practices, a medium-size or larger indoor grow operation can achieve up to 30-35% energy savings compared to a standard indoor grow.<sup>23</sup> The total energy costs for indoor cannabis grow operations typically varies between 20-50% of total operating costs. By comparison, for a typical medium-size or larger brewery, energy use accounts for about 6-12% of total operating costs. The proposed project's electric power service would be provided by the Southern California Edison Company (SCE) which operates and maintains a transmission line adjacent to the project site. Major utility lines run through Koala Road to the east of the project site.

Indoor cannabis cultivation facilities consume up to ~150 kilowatt-hours of electricity per year per square foot, which is about 10 times as much as a typical office building in the Southwest. Assuming this rate of consumption, the proposed project would consume approximately 10,000 kWh of electricity on a daily basis. The project Applicant will be required to closely work with the local electrical utility company to identify existing and future strategies that will be effective in reducing energy consumption. The project Applicant will be required to implement the following mitigation measures as a means to reduce electrical consumption:

- Use of glass or translucent plastic (corrugated polycarbonate 90% light transmission) materials on building roof and gables for greenhouse areas to allow natural daylight in work areas and for plant growth (Conley's 2021).
- Use of 90% Transmission materials internal walls in the greenhouse areas to allow natural daylight use.

In addition, since some operations and security functions may be carried out during non-daylight hours, an additional mitigation measure is suggested to reduce energy consumption during those times.

- The Use of motion activated lighting in the greenhouse areas to reduce energy use at night.

**B. *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*** • *Less Than Significant Impact.*

On January 12, 2010, the State Building Standards Commission adopted updates to the California Green Building Standards Code (Code) which became effective on January 1, 2011. The California Code of Regulations (CCR) Title 24, Part 11: California Green Building Standards (Title 24) became effective to aid efforts to reduce GHG emissions associated with energy consumption. Title 24 now requires that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. The proposed project as well as any future development within the remainder of the project site will be required to conform to all pertinent energy conservation requirements. While the proposed project is a privately owned manufacturing/industrial use, the implementation of similar programs would prove effective in

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<sup>23</sup> Trends and Observations of Energy Use in the Cannabis Industry," Jesse Remillard and Nick Collins, ERS, ACEEE Summer Study of Energy Efficiency in Industry, 2017.

reducing potential energy consumption. The proposed project will be required to comply with all pertinent Title 24 requirements along with other Low Impact Development (LID) requirements.

Pursuant to the California Code of Regulations, Section 16305, beginning January 1, 2023, all holders of indoor, tier 2 mixed-light license types of any size, and all holders of nursery licenses using indoor or tier 2 mixed-light techniques shall ensure that electrical power used for commercial cannabis activity meets the average electricity greenhouse gas emissions intensity required by their local utility provider pursuant to the California Renewables Portfolio Standard Program in division 1, part 1, chapter 2.3, article 16 (commencing with section 399.11) of the Public Utilities Code. The Renewables Portfolio Standard (RPS) is one of California's key programs for advancing renewable energy statewide. The program sets continuously escalating renewable energy procurement requirements for the state's load-serving entities. Generation must be procured from RPS-certified facilities. The California Energy Commission verifies RPS claims.

The project's adherence to the mitigation measures outlined in the previous subsection and its conformance to the requirements outlined above will reduce the potential energy impacts to levels that are less than significant.

## **MITIGATION MEASURES**

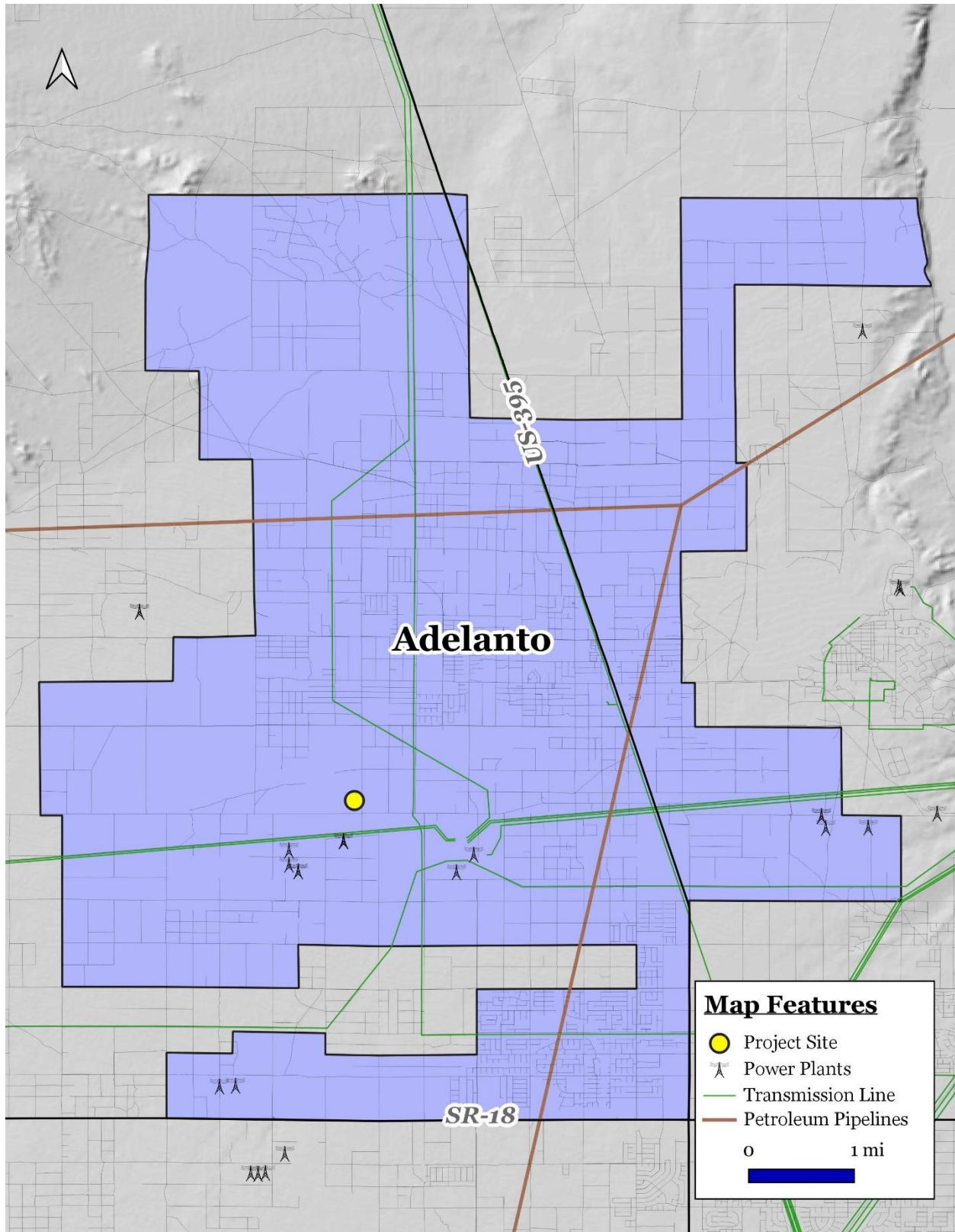
The analysis determined that the following mitigation measures will be required to reduce potential energy consumption:

*Energy Mitigation Measure No. 1.* The project must employ, as much as possible, the use of glass or translucent plastic (corrugated polycarbonate 90% light transmission) materials on building roof and gables for greenhouse areas to allow natural daylight in work areas and for plant growth.

*Energy Mitigation Measure No. 2.* The project must use 90% Transmission materials internal walls in the greenhouse areas to allow natural daylight use.

Since some operations and security functions may be carried out during non-daylight hours, an additional mitigation measure is suggested to reduce energy consumption during those times.

*Energy Mitigation Measure No. 3.* The project must use motion activated lighting in the greenhouse areas to reduce energy use at night.



## EXHIBIT 3-2 ENERGY MAP

SOURCE: CALIFORNIA ENERGY COMMISSION



### 3.7 GEOLOGY & SOILS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
<b>A.</b> Would the project, directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides?			✗	
<b>B.</b> Would the project result in substantial soil erosion or the loss of topsoil?			✗	
<b>C.</b> Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			✗	
<b>D.</b> Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012), creating substantial direct or indirect risks to life or property?			✗	
<b>E.</b> Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?			✗	
<b>F.</b> Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✗		

### ANALYSIS OF ENVIRONMENTAL IMPACTS

**A.** *Would the project, directly or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides? • Less than Significant Impact.*

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The project site is currently vacant and undeveloped and contains a disturbed creosote bush community that supports vegetation such as Nevada joint fir, silver cholla, Joshua tree, rubber rabbitbrush, California buckwheat, and paper bag plant. The site has exhibited considerable human disturbance including illegal dumping and off-road activities. The western portion of the site is traversed by an intermittent stream channel, designated as SPL-2017-00143. According to the EPA's database, this stream *is not* classified as a

“Water of the U.S.” by the U.S. Army Corps of Engineers. The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>31</sup>

The City of Adelanto is located in a seismically active region. Earthquakes from several active and potentially active faults in the Southern California region could affect the proposed project site. In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. A list of cities and counties subject to the Alquist-Priolo Earthquake Fault Zones is available on the State's Department of Conservation website. The City of Adelanto is not on the list.<sup>32</sup> The closest fault to the project site is the Helendale Fault, which is located approximately 18 miles east of the City.<sup>33</sup>

Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two. The amount of ground shaking depends on the intensity of the earthquake, the duration of shaking, soil conditions, type of building, and distance from epicenter or fault. The potential impacts from fault rupture and ground shaking are considered no greater for the project site than for the surrounding areas given the distance between the site and the fault trace. Other potential seismic issues include ground failure and liquefaction. Ground failure is the loss in stability of the ground and includes landslides, liquefaction, and lateral spreading. The project site is in a moderate liquefaction zone.<sup>34</sup> According to the United States Geological Survey, liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid. The risk for liquefaction is no greater on-site than it is for the region. As a result, the potential impacts regarding liquefaction and landslides are less than significant.

**B. *Would the project result in substantial soil erosion or the loss of topsoil? • Less than Significant Impact.***

The University of California, Davis SoilWeb database was consulted to determine the nature of the soils that underlie the project site. According to the University of California, Davis SoilWeb database, the property is underlain by soils of various associations including Bryman, Helendale, Mohave variant, and Cajon soils associations which consist of moderate to fine and well drained soils. Slopes range from 2 to 5 percent.<sup>35</sup> The future use within this site will involve the cultivation of medicinal cannabis. The proposed project's contractors will be required to adhere to specific requirements that govern wind and water erosion during site preparation and construction activities. Following development, the project site would be paved over and landscaped, which would minimize soil erosion. The project's construction will not result in soil erosion with adherence to those development requirements that restrict storm water runoff (and the resulting erosion) and require soil stabilization. In addition, stormwater discharges from construction activities that disturb one or more acres, or smaller sites disturbing less than one acre that are part of a common plan of development or sale, are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program. Prior to initiating construction, contractors must obtain coverage under a

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<sup>31</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.

<sup>32</sup> California Department of Conservation. *Table 4, Cities and Counties Affected by Alquist Priolo Earthquake Fault Zones as of January 2010*.

<sup>33</sup> California Department of Conservation. *The Helendale Fault*.

<sup>34</sup> San Bernardino County. *Multi-Jurisdictional Hazard Mitigation Plan* - July 13, 2017.

<sup>35</sup> UC Davis. *SoilWeb*. Website accessed August 11, 2021.

NPDES permit, which is administered by the State. In order to obtain an NPDES permit, the project Applicant must prepare a Stormwater Pollution Prevention Plan (SWPPP). The County has identified sample construction Best Management Practices (BMPs) that may be included in the mandatory SWPPP. The use of these construction BMPs identified in the mandatory SWPPP will prevent soil erosion and the discharge of sediment into the local storm drains during the project's construction phase. As a result, the impacts will be less than significant.

- C.** *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? • Less than Significant Impact.*

The proposed project's construction will not result in soil erosion since the project's contractors must implement the construction BMPs identified in the mandatory SWPPP. The BMPs will minimize soil erosion and the discharge of sediment off-site. Additionally, the project site is not located within an area that could be subject to landslides or liquefaction.<sup>28</sup> The soils that underlie the project site possess a low potential for shrinking and swelling. Soils that exhibit certain shrink swell characteristics become sticky when wet and expand according to the moisture content present at the time. Since the soils have a low shrink-swell potential, lateral spreading resulting from an influx of groundwater is slim. As a result, the potential impacts will be less than significant.

- D.** *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012), creating substantial direct or indirect risks to life or property? • Less than Significant Impact.*

The University of California, Davis SoilWeb database was consulted to determine the nature of the soils that underlie the project site. According to the University of California, Davis SoilWeb database, the property is underlain by soils of various associations including Bryman, Helendale, Mohave variant, and Cajon soil associations.<sup>36</sup> According to the U.S. Department of Agriculture, these soils are acceptable for the development of smaller commercial buildings.<sup>30</sup> The applicant is required to adhere to all requirements detailed by the USDA, resulting in potential impacts which will be less than significant.

- E.** *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? • No Impact.*

The proposed project will connect to sanitary sewers. A new 6-inch sewer line will connect to an existing line in Koala Road. As a result, no impacts associated with the use of septic tanks will occur.

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<sup>28</sup> United States Department of Agriculture, Soil Conservation Service. *Soil Survey of Riverside California – Palm Spring Area*. Report dated 1978.

<sup>36</sup> UC Davis. *SoilWeb*. Website accessed August 11, 2021.

<sup>30</sup> United States Department of Agriculture. Natural Resources Conservation Service. Website accessed August 11, 2021.

**F. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? • Less than Significant Impact with Mitigation.**

The surface deposits in the proposed project area are composed entirely of younger Quaternary Alluvium. This younger Quaternary Alluvium is unlikely to contain significant vertebrate fossils, at least in the uppermost layers. The closest fossil vertebrate locality is LACM 7786, between Adelanto and the former George Air Force Base. This locality produced a fossil specimen of meadow vole, *Microtus*. The next closest vertebrate fossil locality from these deposits is LACM 1224, west of Spring Valley Lake, which produced a specimen of fossil camel, *Camelops*. Additionally, on the western side of the Mojave River below the bluffs, an otherwise unrecorded specimen of mammoth was collected in 1961 from older Quaternary Alluvium deposits.<sup>37</sup>

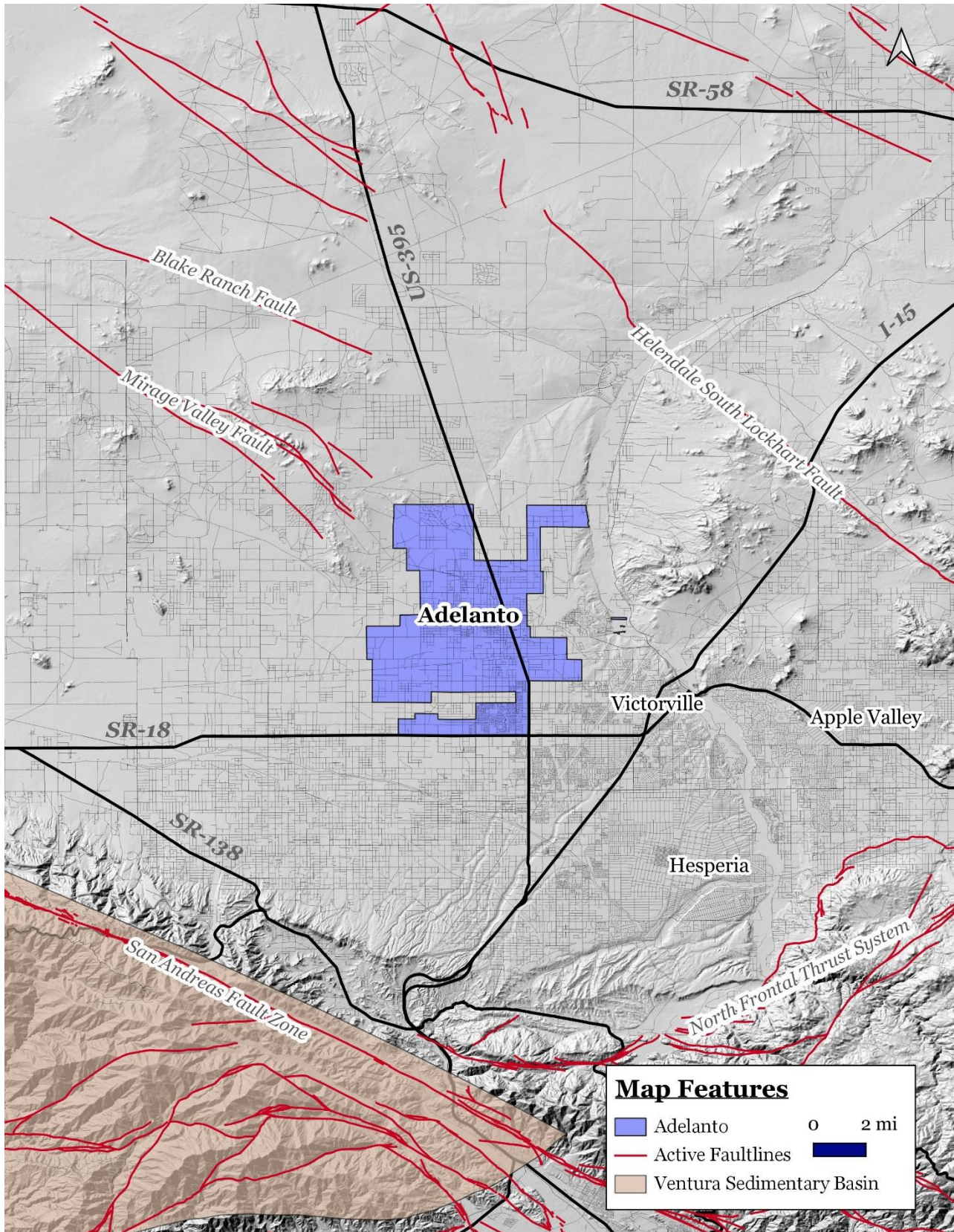
In Section 3.5, Cultural Resources Mitigation Measure No. 4 requires that a final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Adelanto prior to building final. This mitigation measure will reduce the impacts to levels that are less than significant.

## **MITIGATION MEASURES**

In Section 3.5, Cultural Resources Mitigation Measure No. 4 requires that a final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Adelanto prior to building final. This mitigation measure will reduce the impacts to levels that are less than significant.

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<sup>37</sup> Natural History Museum. [Vertebrate Paleontology Collections](#). Website accessed August 17, 2021.



### EXHIBIT 3-3 GEOLOGY MAP

SOURCE: DEPARTMENT OF CONSERVATION



### 3.8 GREENHOUSE GAS EMISSIONS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✗	
B. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✗	

#### ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? • Less than Significant Impact.*

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The State of California requires CEQA documents to include an evaluation of greenhouse gas (GHG) emissions of gases that trap heat in the atmosphere. GHG are emitted by both natural processes and human activities. Examples of GHG that are produced both by natural and industrial processes include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O). Carbon dioxide equivalent, or CO<sub>2</sub>E, is a term that is used for describing different greenhouses gases in a common and collective unit. The SCAQMD established the 10,000 MTCO<sub>2</sub> threshold for industrial land uses. As indicated in Table 3-4, the operational CO<sub>2</sub>E is 2,145.12 metric tons per year which is well below the threshold.

**Table 3-4  
Greenhouse Gas Emissions Inventory**

Source	GHG Emissions (metric tons/year)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	MTCO <sub>2</sub> E
Long-Term – Area Emissions	--	--	0.00	--
Long-Term - Energy Emissions	747.81	0.04	0.01	751.95
Long-Term - Mobile Emissions	994.12	0.06	0.05	1,012.07
Long-Term - Total Emissions	1,741.93	0.10	0.06	1,764.02
Significance Threshold				<b>10,000 MTCO<sub>2</sub>E</b>

Furthermore, as mentioned in Section 3.17, Transportation, the projected vehicle trips to and from the site will not be significant given the proposed use. All vehicle, equipment and machinery sales transactions will be completed through an online auction-style website. Very few customers will visit the project site since the new business will be closed to the general public. Because of security protocols, the mobile emissions related to operations will be limited to employees, vendors, deliveries, and repair/maintenance personnel.

As indicated in Table 3-3, the majority of the GHG emissions (3,028.4 MTCO<sub>2</sub>E) will originate from mobile sources. As a result, the potential impacts are considered to be less than significant.

**B. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases? • Less than Significant Impact.***

AB-32 requires the reduction of GHG emissions to 1990 levels, which would require a minimum 28% in "business as usual" GHG emissions for the entire State. Additionally, Governor Edmund G. Brown signed into law Executive Order (E.O.) B-30-15 on April 29, 2015, the Country's most ambitious policy for reducing Greenhouse Gas Emissions. Executive Order B-30-15 calls for a 40% reduction in greenhouse gas emissions below 1990 levels by 2030.<sup>38</sup>

The San Bernardino County Transit Authority (SBCTA) authorized the preparation of a county-wide Regional Greenhouse Gas Reduction Plan. This plan was adopted in March 2021. The plan contains multiple reduction measures that would be effective in reducing GHG emissions throughout the SBCTA region. The lack of development in the immediate area may preclude residents from obtaining employment or commercial services within City boundaries, thus compelling residents to travel outside of City boundaries for employment and commercial services. It is important to note that the California Department of Transportation as well as the Counties of Los Angeles and San Bernardino are engaged in an effort to construct a multi-modal transportation corridor consisting of public transit, a new freeway, and bicycle lanes known as the High Desert Corridor (HDC). The aforementioned regional program will reduce potential GHG emissions related to excessive VMTs to levels that are less than significant.

Those Partnership jurisdictions, including Adelanto, choosing to complete and adopt local CAPs that are consistent with the County's GHG Reduction Plan and with the prior Regional Plan Program EIR and the addendum or supplemental CEQA document prepared by SBCOG will be able to tier their future project-level CEQA analyses of GHG emissions from their CAP. This can help to streamline project-level CEQA review. The City of Adelanto selected a goal to reduce its community GHG emissions to a level that is 40% below its 2020 GHG emissions level by 2030. The City will meet and exceed this goal subject to reduction measures that are technologically feasible and cost effective through a combination of state (~60%) and local (~40%) efforts. The Pavley vehicle standards, the state's LCFS, the RPS, and other state measures will reduce GHG emissions in Adelanto's on-road, off-road, and building energy sectors in 2030. An additional reduction of 59,812 MTCO<sub>2</sub>e will be achieved primarily through the following local measures, in order of reductions achieved: GHG Performance Standard for New Development (PS-1); solar installation for existing commercial/industrial facilities (Energy-8); and waste diversion and reduction (Waste-2).<sup>39</sup>

Adelanto's reduction plan has the greatest effect on GHG emissions in the building energy, waste, and on-road transportation. The City of Adelanto adopted the North Adelanto Sustainable Community Plan which is a City planning framework that contains many transportation and land use-related actions to reduce vehicle-related GHG emissions throughout the region. This community plan supports the goals of SB 375 and the Sustainable Communities Strategy (On Road-STATE-SCS) through a wide range of actions which include the following.

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<sup>38</sup> Office of Governor Edmund G. Brown Jr. *New California Goal Aims to Reduce Emissions 40 Percent Below 1990 Levels by 2030.*

<sup>39</sup> San Bernardino County. *San Bernardino County Regional Greenhouse Gas Reduction Plan (SBCRGGRP)*. March, 2021.

- Integrate state, regional, and local sustainable community/smart growth principles into the development and entitlement process.
- Develop a system of trails and corridors that facilitates and encourages bicycling and walking.
- Require new development to provide transit facilities, such as bus shelters, transit bays, and turnouts, as necessary.
- Require the future development of community-wide servicing facilities to be sites in transit-ready areas that can be served and made accessible by public transit.
- Provide development-related incentives for projects that promote transit use.
- Designate and maintain a network of City truck routes that provide for the effective transport of goods while minimizing negative impacts on local circulation and noise sensitive land uses.
- Transition the City fleet to low emission/fuel-efficient vehicles as they are retired from service. λ Encourage carpooling.
- Work with the regional transit provider to provide shade, weather protection, seating, and lighting at all stops.

Key general plan policies that support the City of Adelanto's GHG reduction measures or would contribute to GHG reductions and sustainable practices in the City are listed below:

- *Policy NR 1.4:* All new developments will be required to implement energy conservation techniques into the development design.
- *Policy NR 1.6:* Conservation techniques shall be required for proposed development (both domestic and industrial) to minimize consumption levels of renewable and non-renewable natural resources including water resources.
- *Policy NR 1.1:* The City shall promote the development and use of alternative energy sources, such as passive solar in industrial, commercial, and residential developments.
- *Policy NR 1.1:* The City shall promote the development and use of alternative energy sources, such as passive solar in industrial, commercial, and residential developments.
- *Policy NR 1.6:* Conservation techniques shall be required for proposed development (both domestic and industrial) to minimize consumption levels of renewable and non-renewable natural resources including water resources.
- *Policy AQ 1.1:* The City shall continue to work with the Mojave Desert Air Quality Management District and any other agencies in order to enforce and implement regional air quality plans.
- *Policy WQ 1.1:* The City will require that development be designed and constructed to conserve water utilizing low flow irrigation and plumbing fixtures and facilities.



- *Policy WQ 1.5:* The City will require that all new development utilize water conservation techniques to conserve water resources, such as the use of low-flow irrigation and plumbing systems in new and existing development.

The proposed project will not involve or require any variance from an adopted plan, policy, or regulation governing GHG emissions. As a result, no potential conflict with an applicable greenhouse gas policy plan, policy, or regulation will occur and the potential impacts are considered to be less than significant.

## **MITIGATION MEASURES**

The analysis of potential impacts related to greenhouse gas emissions indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

### 3.9 HAZARDS & HAZARDOUS MATERIALS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✗	
B. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			✗	
C. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✗
D. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				✗
E. Would the project for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				✗
F. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✗
G. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				✗

#### ANALYSIS OF ENVIRONMENTAL IMPACTS

**A.** *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? • Less than Significant Impact.*

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>40</sup>

The project's construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project's construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. These products are strictly controlled

<sup>40</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.

and regulated and in the event of any spill, cleanup activities would be required to adhere to all pertinent protocols. Once operational, the potentially hazardous materials that are often associated with the new development that involves the cultivation of cannabis are outlined below.

- *Mold.* Marijuana production requires increased levels of humidity and this increased humidity in the presence of organic material, promotes the growth of mold. Previous studies of illegal indoor cultivation operations have reported elevated levels of airborne mold spores, especially during activities such as plant removal by law enforcement personnel. Physiological effects include allergic reactions, hypersensitivity, and anaphylaxis to marijuana.
- *Skin Sensitivity.* Skin contact through personal handling of plant material or occupational exposure has been associated with hives, itchy skin, and swollen or puffy eyes. As with most sensitizers, initial exposure results in a normal response, but over time, repeated exposures can lead to progressively strong and abnormal responses.
- *Carbon dioxide (CO<sub>2</sub>).* CO<sub>2</sub> is used in the marijuana industry to increase plant growth and to produce concentrates. In addition to the liquid gas form, solid carbon dioxide or dry ice can be used for extraction processes. Compressed gases can present a physical hazard and has additional safety regulations that must be adhered to.
- *Carbon monoxide (CO).* CO is a colorless, odorless, toxic gas which interferes with the oxygen-carrying capacity of blood. At elevated concentrations, CO can overcome persons without warning. Sources of carbon monoxide exposure include furnaces, hot water heaters, portable generators/generators in buildings; concrete cutting saws, compressors; forklifts, power trowels, floor buffers, space heaters, welding, and gasoline powered pumps.
- *Indoor Air Quality.* Workers may encounter ozone as a product of the chemical reaction of nitrogen oxides and volatile organic compounds (e.g., terpenes emitted from the marijuana plant) present inside a cultivation facility. Terpenes and nitric oxides are associated with eye, skin, and mucous irritation. Ozone generators may also be found in facilities for odor control. Ozone can cause decreased lung function and/or exacerbate pre-existing health effects, especially in workers with asthma or other respiratory complications.
- *Pesticides.* Cannabis cultivation facilities may have insecticides and fungicides used within the facility. Some pesticides, including pyrethrins and neem oil are non-persistent and have low volatility (neem oil is an organic pest repellent derived from the neem tree). However, these pesticides have been associated with dermal and respiratory toxicity for the workers who apply them. Depending on the pesticide, requirements from 40 CFR Part 170 also known as the EPA's Agricultural Worker Protection Standard or WPS may need to be implemented.
- *Nutrients and Corrosive Chemicals.* Cannabis Cultivation facilities may encounter corrosive chemicals in the mixing of nutrients used for plant growth. Respiratory hazards may also occur from breathing in corrosive vapors or particles that irritate or burn the inner lining of the nose, throat, and lungs.

The Applicant will be required to prepare a safety and hazard mitigation plan (SHMP) that indicates those protocols that must be adhered to in the event of an accident. The SHMP would first identify the initial steps

that can be performed to establish a safety and health program within the proposed facility. The SHMP would consist of the following elements:

- The SHMP would outline the hazards for the facility by category (biological, chemical, and physical).
- For each hazard, a general description is given followed by information on the job role that might be specifically affected by the hazard, considerations for a hazard assessment, best practices for eliminating or managing the hazard, Federal, state, or local regulations that may apply to that hazard, and additional resources to assist in hazard recognition and management.
- A detailed outline of safety and health programs that should be implemented within the facility and provides examples and tools to help develop these programs.

The SHMP will be reviewed and approved by the County of San Bernardino Fire Department prior to the issuance of the Occupancy Permit. As a result, less than significant impacts will occur.

**B. *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*** • *Less than Significant Impact.*

Cannabis “manufacturer” refers to the production, preparation, propagation, or compounding of cannabis products, including extraction processes, infusion processes, the packaging or repackaging of manufactured medical cannabis or medical cannabis products, and labeling or relabeling the packages of manufactured medical cannabis or medical cannabis products. In addition, the facility’s use of nonvolatile or volatile solvents will determine what kind of California cannabis manufacturing license will be required. “Nonvolatile solvent” refers to any solvent used in the extraction process that is not a volatile solvent, including carbon dioxide. “Volatile solvent” refers to any solvent that is or produces a flammable gas or vapor that, when present in the air in sufficient quantities, will create explosive or ignitable mixtures. Examples of volatile solvents include butane, hexane, propane, and ethanol. A Type 6 cannabis manufacturing licensee can only use nonvolatile solvents while a Type 7 licensee can use both nonvolatile and volatile solvents in its extractions and infusions. For purposes of this analysis, it has been assumed that the facility’s operation would require a Type 7 license. All chemical extractions must take place within a professional, closed-loop system, which also has its own state law requirements. The rules also contain strict packaging and labeling requirements, require all personnel to be trained, and mandates that the manufacturing licensee to adhere to strict quality control requirements.

The project’s construction would require the use of diesel fuel to power the construction equipment. The diesel fuel would be properly sealed in tanks and would be transported to the site by truck. Other hazardous materials that would be used on-site during the project’s construction phase include, but are not limited to, gasoline, solvents, architectural coatings, and equipment lubricants. These products are strictly controlled and regulated and in the event of any spill, cleanup activities would be required to adhere to all pertinent protocols. The Applicant will be required to prepare a safety and hazard mitigation plan that indicates those protocols that must be adhered to in the event of an accident. This plan will be reviewed and approved by the County of San Bernardino Fire Department prior to the issuance of the Occupancy Permit. As indicated in Subsection D, the project site is not listed in either the CalEPA’s Cortese List or the Environstor database. As a result, the likelihood of encountering contamination or other environmental concerns during the project’s construction phase is remote and the impacts will be less than significant.

- C.** *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? • No Impact.*

There are no schools located within one-quarter of a mile from the project site. The nearest schools are Adelanto High School located approximately 2 miles away and Donald F Bradach Elementary School, located approximately 2.5 miles southwest of the project site. These schools are located out of the City's corporate boundaries. Victoria Magathan Elementary School is 2.5 miles away southwest of the project site and is within the city's boundaries. As a result, the proposed project will not create a hazard to any local school and no impacts are anticipated.

- D.** *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? • No Impact.*

Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List. The Cortese List is a planning document used by the State and other local agencies to comply with CEQA requirements that require the provision of information regarding the location of hazardous materials release sites. A search was conducted through the California Department of Toxic Substances Control Envirostor website to identify whether the project site is listed in the database as a Cortese site. The project site is not identified as a Cortese site.<sup>32</sup> Therefore, no impacts will occur.

- E.** *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? • No Impact.*

The project site is not located within an airport land use plan and is not located within two miles of a public airport or public use airport. The nearest airport to the site is the Adelanto Airport located approximately 1½ miles to the south.<sup>41</sup> The project will not introduce a structure that will interfere with the approach and take off of airplanes utilizing any airport. As a result, no impacts related to this issue will occur.

- F.** *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? • No Impact.*

At no time will any adjacent street be completely closed to traffic during the proposed project's construction. In addition, all construction staging must occur on-site. As a result, no impacts are associated with the proposed project's implementation.

- G.** *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires? • No Impact.*

The project site and the adjacent properties are developed. The project site is not located within a "moderate fire hazard severity zone."<sup>33</sup> As a result, no impacts will result.

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<sup>32</sup> CalEPA. *DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List)*.

<sup>41</sup> Ibid.

<sup>33</sup> CalFire. *Very High Fire Hazard Severity Zone Map for SW San Bernardino County*.

## **MITIGATION MEASURES**

The analysis of potential impacts related to hazards and hazardous materials indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

### 3.10 HYDROLOGY & WATER QUALITY

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			✗	
B. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			✗	
C. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or, impede or redirect flood flows?		✗		
D. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?				✗
E. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✗

### ANALYSIS OF ENVIRONMENTAL IMPACTS

**A.** *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? • Less than Significant Impact.*

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The project site is currently vacant and undeveloped and contains a disturbed creosote bush community that supports vegetation such as Nevada joint fir, silver cholla, Joshua tree, rubber rabbitbrush, California buckwheat, and paper bag plant. The site has exhibited considerable human disturbance including illegal dumping and off-road activities. The western portion of the site is traversed by an intermittent stream channel, designated as SPL-2017-00143. According to the EPA's database, this stream *is not* classified as a "Water of the U.S." by the U.S. Army Corps of Engineers. The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>42</sup>

<sup>42</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.

The project Applicant will be required to adhere to Chapter 17.93 - Erosion and Sediment Control, of the municipal code regulates erosion and sediment control. These regulations outlined in Section 17.93.050 – Soil Erosion and Sediment Control Plan. The project Applicant will also be required to conform to Section 17.93.060 – Runoff Control of the City’s Municipal Code. In addition, stormwater discharges from construction activities that disturb one or more acres are regulated under the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program. As a result, the construction impacts will be less than significant.

**B.** *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? • Less than Significant Impact.*

Water used to control fugitive dust will be transported to the site via truck. No direct ground water extraction will occur. Furthermore, the construction and post-construction BMPs will address contaminants of concern from excess runoff, thereby preventing the contamination of local groundwater. These BMP controls may include, but not be limited to, the following:

- Stabilization practices for all areas disturbed by construction and grading.
- Structural practices for all drainage/discharge locations.
- Stormwater management controls, including measures used to control pollutants occurring in stormwater discharges after construction activities are complete & Velocity dissipation devices to provide nonerosive flow conditions from the discharge point along the length of any outfall channel.
- Other controls, including waste disposal practices that prevent discharge of solid materials.

In addition, there would be no direct groundwater withdrawals associated with the proposed project’s implementation. As a result, the impacts are considered to be less than significant.

**C.** *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or, impede or redirect flood flows? • Less than Significant Impact.*

The western portion of the site is traversed by an intermittent stream channel that is *not* classified as a “Water of the U.S” by the U.S. Army Corps of Engineers. The stream designation is SPL-2017-00143. According to the EPA’s database, this stream is *not* classified as a “Water of the U.S.” The streambed was last considered by the Army Corps of Engineers on July 19, 2017. “Waters of the United States” is a threshold term in the Clean Water Act (CWA) and establishes the scope of federal jurisdiction under the Act. The CWA does not define “waters of the United States”; rather, it provides discretion for EPA and the U.S. Department of the Army (i.e., Army Corps of Engineers) to define “Waters of the United States” in regulations. If a stream is classified as a “Water of the United States,” a streambed alteration permit or a Section 404 Permit would be required. This permit is designed to regulate the discharge of dredged or fill material into waters



of the United States, including wetlands. The eroded channel is dry and does not include any unique riparian or wetlands vegetation though the concentration of creosote habitat and Joshua trees are more pronounced along the drainage course compared to other areas within the site. The site plan indicates that an 80-foot-wide drainage easement along the site's westernmost side would be installed. As a result, the potential impacts will be less than significant.

**D.** *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?* • *No Impact.*

According to the Federal Emergency Management Agency (FEMA) flood insurance maps obtained for the City of Adelanto, the proposed project site is located in an Undetermined Flood Hazard zone.<sup>34</sup> The proposed project site is not located in an area that is subject to inundation by seiche or tsunami. As a result, no impacts are anticipated.

**E.** *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?* • *No Impact.*

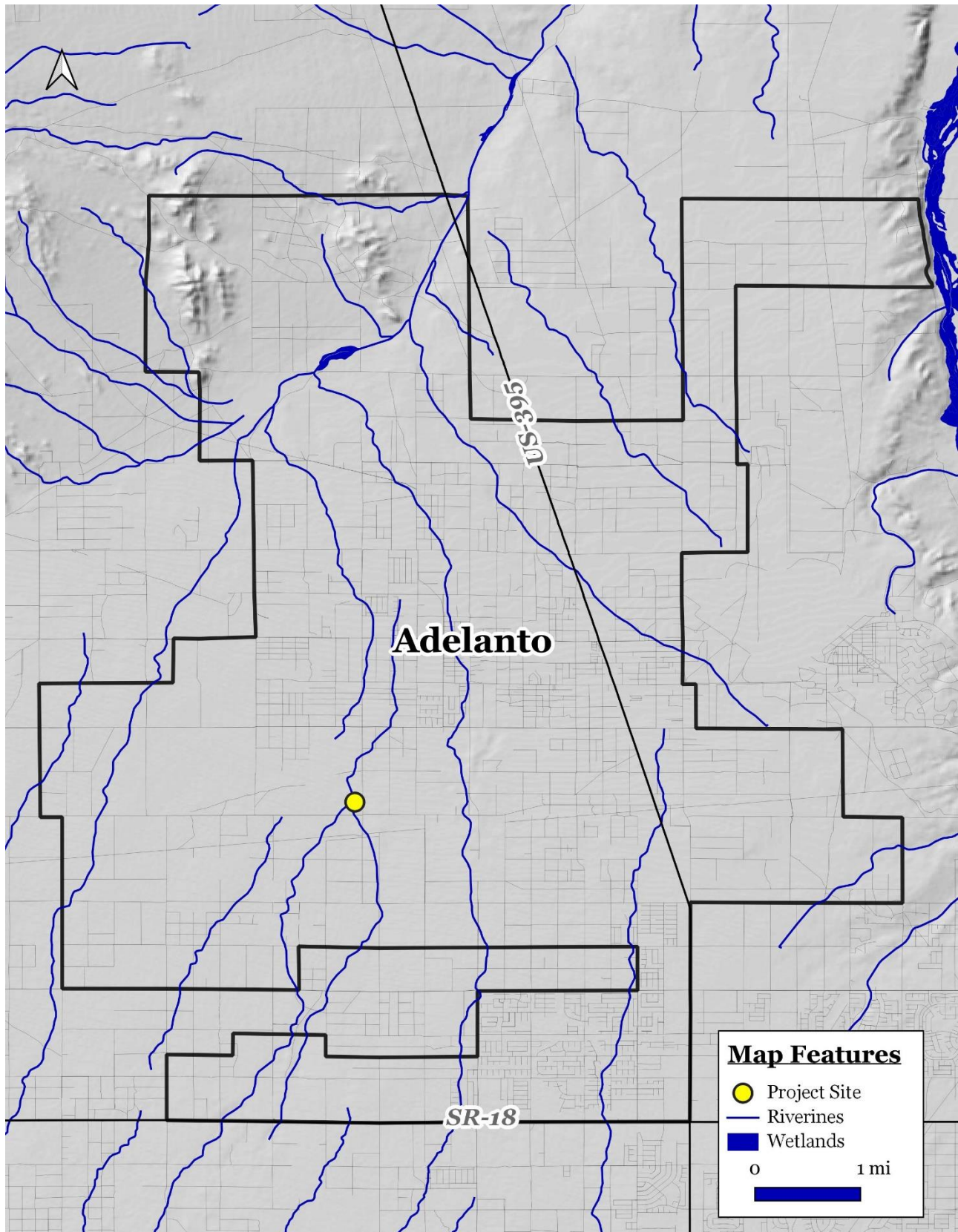
The proposed project is required to be in compliance with Chapter 17.93 the City of Adelanto Municipal Code. Chapter 17.93 of the City of Adelanto Municipal Code is responsible for implementing the NPDES and MS4 stormwater runoff requirements. In addition, the project's operation will not interfere with any groundwater management or recharge plan because there are no active groundwater management recharge activities on-site or in the vicinity. As a result, no impacts are anticipated.

## **MITIGATION MEASURES**

As indicated previously, hydrological characteristics will not substantially change as a result of the proposed project. As a result, no mitigation is required.

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<sup>34</sup> Federal Emergency Management Agency. *Flood Insurance Rate Mapping Program*. 2020.



## EXHIBIT 3-4

### 3.11 LAND USE & PLANNING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project physically divide an established community?				✗
B. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				✗

#### ANALYSIS OF ENVIRONMENTAL IMPACTS

##### A. *Would the project physically divide an established community?* • No Impact.

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The project site is currently vacant and undeveloped and contains a disturbed creosote bush community that supports vegetation such as Nevada joint fir, silver cholla, Joshua tree, rubber rabbitbrush, California buckwheat, and paper bag plant. The site has exhibited considerable human disturbance including illegal dumping and off-road activities. The western portion of the site is traversed by an intermittent stream channel, designated as SPL-2017-00143. According to the EPA's database, this stream *is not* classified as a "Water of the U.S." by the U.S. Army Corps of Engineers. The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>43</sup>

Access to the project site will be provided by a secured driveway located along Koala Road. Land uses and development in the vicinity of the proposed project include the following:

- *North of the project site:* Vacant and undisturbed land parcels are located directly to the north of the project site. These parcels are zoned as *Manufacturing/Industrial (MI)*.<sup>44</sup>
- *East of the project site:* Abutting the project site to the east, is Koala Road. This area is zoned as *Manufacturing/Industrial (MI)* with uses involving McElroy Metal Service Center, General Atomics, and Storo Pack.
- *South of the project site:* Rancho Road extends along the project site's south side. Extending further to the south, are manufacturing/industrial uses of Scott Turbon Mixer, Tikun Olam California,

<sup>43</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.

<sup>44</sup> Google Maps and City of Adelanto Zoning Map. Website accessed on August 5, 2021.

Diamond Research Company, and Borden's Heavy Haul. The High Desert Detention Center is further south of these manufacturing/industrial uses.

- *West of the project site:* Vacant and undisturbed land abuts the project site to the west. These parcels are zoned *Manufacturing/Industrial (MI)*. Further west is the city's boundaries along Yucca Road.

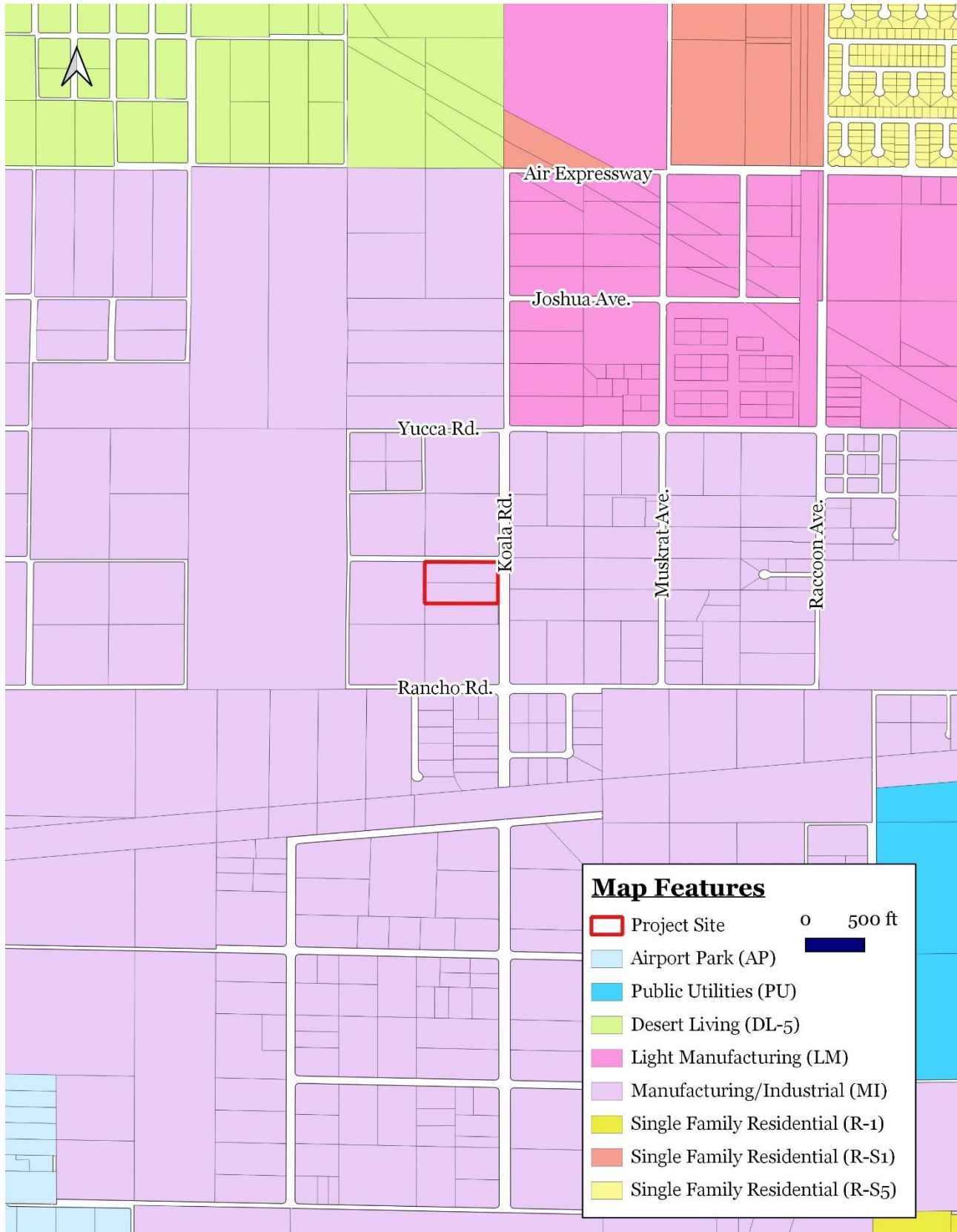
The granting of the requested entitlements and subsequent construction of the proposed project will not result in any expansion of the use beyond the current boundaries. As a result, the project will not lead to any division of an existing established neighborhood and no impacts will occur.

**B.** *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?* • *No Impact.*

The City of Adelanto permits and regulates Medicinal and Adult Use Cannabis activities in designated zones. Cannabis activity is permitted with a Conditional Use Permit (CUP) in the following zones: Manufacturing/Industrial (MI), Light Manufacturing Cannabis Only (LMCO), Manufacturing Industrial (MI), and Airport Development District (ADD). A zoning map is provided in Exhibit 3-5. Because the proposed project site is located within a Light Manufacturing zoning designation in the southwestern portion of the City, a CUP is required. As a result, no impacts will occur.

## **MITIGATION MEASURES**

The analysis determined that no impacts on land use and planning would result upon the implementation of the proposed project. As a result, no mitigation measures are required.



**EXHIBIT 3-5**  
**LAND USE MAP**  
 SOURCE: CITY OF ADELANTO

### 3.12 MINERAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?				×
B. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				×

#### ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?* • *No Impact.*

A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site. The Surface Mining and Reclamation Act of 1975 (SMARA) has developed mineral land classification maps and reports to assist in the protection and development of mineral resources. According to the SMARA, the following four mineral land use classifications are identified:

- *Mineral Resource Zone 1 (MRZ-1):* This land use classification refers to areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- *Mineral Resource Zone 2 (MRZ-2):* This land use classification refers to areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists.
- *Mineral Resource Zone 3 (MRZ-3):* This land use classification refers to areas where the significance of mineral deposits cannot be evaluated from the available data. Hilly or mountainous areas underlain by sedimentary, metamorphic, or igneous rock types and lowland areas underlain by alluvial wash or fan material are often included in this category. Additional information about the quality of material in these areas could either upgrade the classification to MRZ-2 or downgraded it to MRZ-1.
- *Mineral Resource Zone 4 (MRZ-4):* This land use classification refers to areas where available information is inadequate for assignment to any other mineral resource zone.

The project site is not located in a Significant Mineral Aggregate Resource Area (SMARA) nor is it located in an area with active mineral extraction activities. A review of California Division of Oil, Gas, and Geothermal Resources well finder indicates that there are no wells located in the vicinity of the project site.<sup>45</sup> The project site is located within Mineral Resource Zone (MRZ-3A), meaning there may be significant

<sup>45</sup> California, State of. Department of Conservation. *California Oil, Gas, and Geothermal Resources Well Finder*.

mineral resources present.<sup>46</sup> As indicated previously, the site develop and there are no active mineral extraction activities occurring on-site or in the adjacent properties. As a result, no impacts to mineral resources will occur.

**B.** *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?* • *No Impact.*

As previously mentioned, no mineral, oil, or energy extraction and/or generation activities are located within the project site. Moreover, the proposed project will not interfere with any resource extraction activity. Therefore, no impacts will result from the implementation of the proposed project.

## **MITIGATION MEASURES**

The analysis of potential impacts related to mineral resources indicated that no significant adverse impacts would result from the approval of the proposed project and its subsequent implementation. As a result, no mitigation measures are required.

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<sup>46</sup> California Department of Conservation. *Mineral Land Classification Map for the Adelanto Quadrangle*. Map accessed August 11, 2021.

### 3.13 NOISE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
<b>A.</b> Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			✗	
<b>B.</b> Would the project result in generation of excessive groundborne vibration or groundborne noise levels?			✗	
<b>C.</b> For a project located within the vicinity of a private airstrip or- an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✗

#### ANALYSIS OF ENVIRONMENTAL IMPACTS

- A.** *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? • Less than Significant Impact.*

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The project site is currently vacant and undeveloped and contains a disturbed creosote bush community that supports vegetation such as Nevada joint fir, silver cholla, Joshua tree, rubber rabbitbrush, California buckwheat, and paper bag plant. The site has exhibited considerable human disturbance including illegal dumping and off-road activities. The western portion of the site is traversed by an intermittent stream channel, designated as SPL-2017-00143. According to the EPA's database, this stream *is not* classified as a "Water of the U.S." by the U.S. Army Corps of Engineers. The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>47</sup>

The most commonly used unit for measuring the level of sound is the decibel (dB). Zero on the decibel scale represents the lowest limit of sound that can be heard by humans. The eardrum may rupture at 140 dB. In general, an increase of between 3.0 dB and 5.0 dB in the ambient noise level is considered to represent the

<sup>47</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.



threshold for human sensitivity.(refer to Exhibit 3-6) In other words, increases in ambient noise levels of 3.0 dB or less are not generally perceptible to persons with average hearing abilities.<sup>38</sup>

Future sources of noise generated on-site will include noise from vehicles traveling to and from the project and noise emanating from back-up alarms, air conditioning units, and other equipment. All of the cultivation and manufacturing of cannabis products will occur indoors. In addition, the operation of the facility will not expose surrounding uses to excessive noise since interior noise will be further attenuated by the building's exterior shell. Finally, there are no noise sensitive land uses located in the vicinity of the site. As a result, the proposed project will not expose sensitive receptors to excessive noise levels and the potential impacts are considered to be less than significant. As a result, the impacts will be less than significant.

**B.** *Would the project result in generation of excessive groundborne vibration or groundborne noise levels? • Less than Significant Impact.*

Once in operation, the proposed project will not significantly raise groundborne noise levels. Slight increases in ground-borne noise levels could occur during the construction phase. The limited duration of construction activities and the City's construction-related noise control requirements will reduce the potential impacts to levels that are less than significant. Furthermore, there are no sensitive receptors or noise sensitive land uses located near the project site. As a result, the impacts will be less than significant.

**C.** *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? • No Impact.*

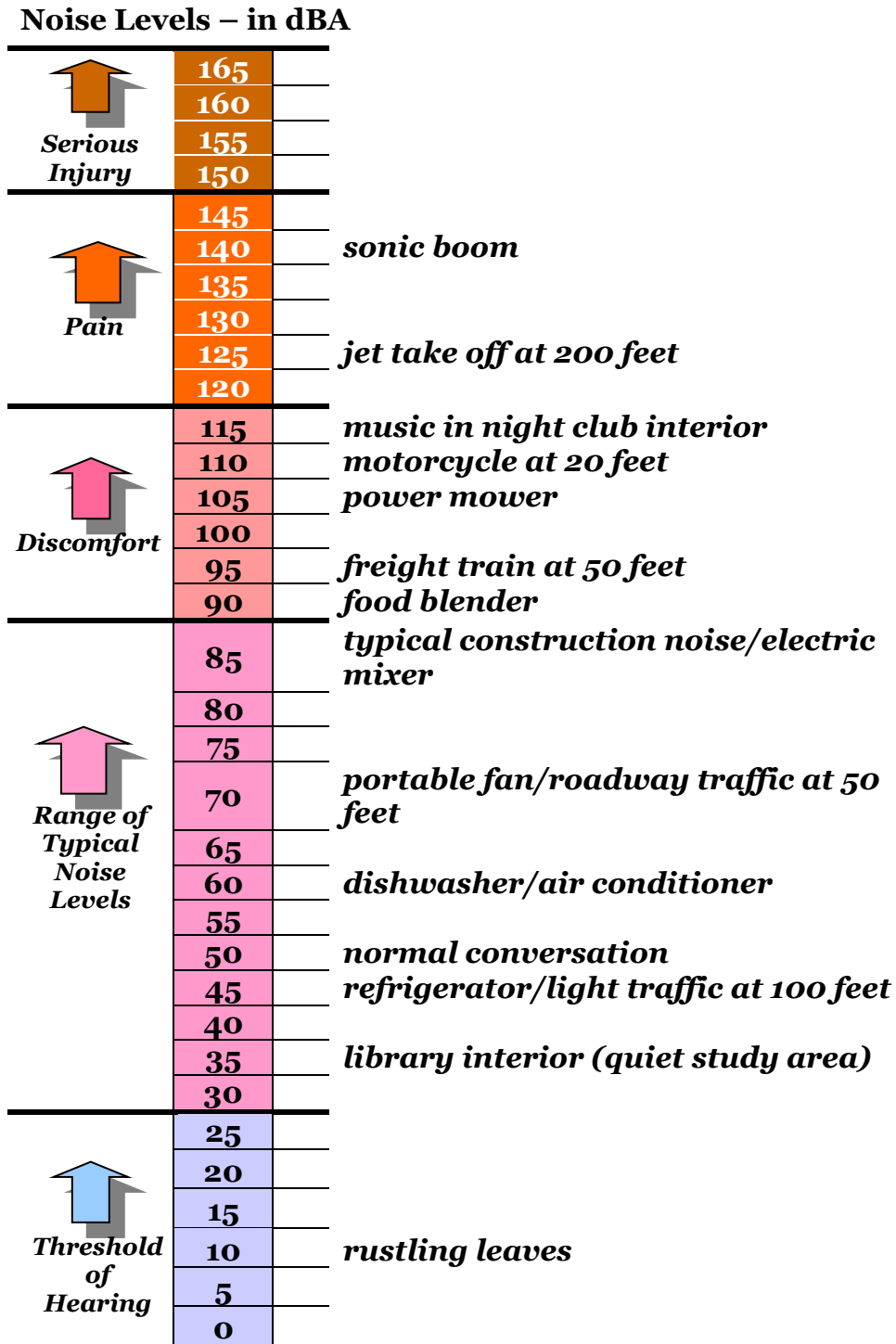
The project site is not located within an airport land use plan and is not located within two miles of a public airport or private airport. The proposed use is not considered to be a sensitive receptor and no sensitive receptors are located adjacent to the project site. As a result, the proposed project will not expose people residing or working in the project area to excessive noise levels related to airport uses. As a result, no impacts will occur.

## MITIGATION MEASURES

The analysis of potential noise impacts indicated that no significant adverse impacts would result from the proposed project's construction and operation. As a result, no mitigation measures are required.

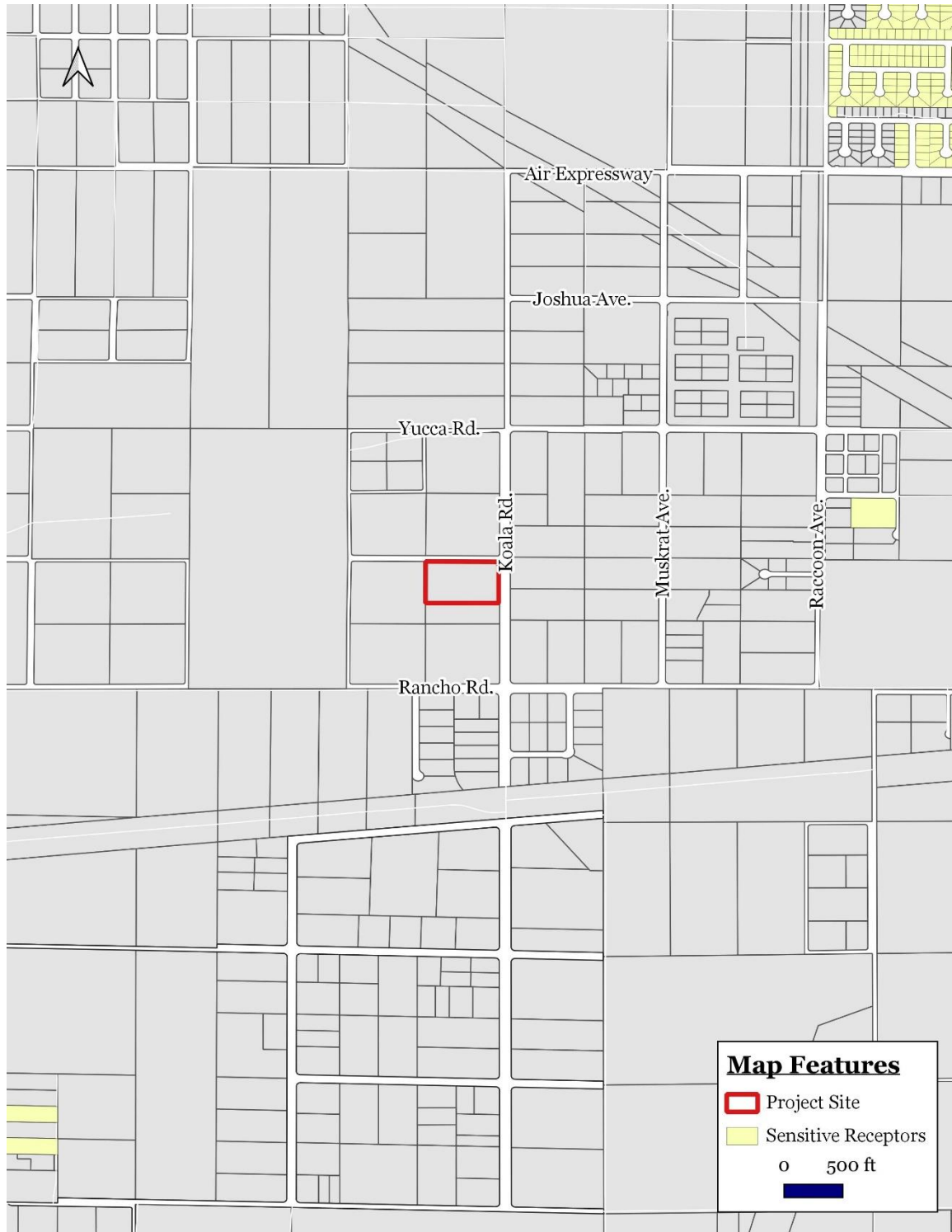
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<sup>38</sup> Bugliarello, et. al. *The Impact of Noise Pollution*, Chapter 127, 1975.



### EXHIBIT 3-6 TYPICAL NOISE SOURCES AND LOUDNESS SCALE

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING



## EXHIBIT 3-7 SENSITIVE RECEPTORS

SOURCE: BLODGETT BAYLOSIS ENVIRONMENTAL PLANNING

### 3.14 POPULATION & HOUSING

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				×
B. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				×

#### ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? • No Impact.*

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The project site is currently vacant and undeveloped and contains a disturbed creosote bush community that supports vegetation such as Nevada joint fir, silver cholla, Joshua tree, rubber rabbitbrush, California buckwheat, and paper bag plant. The site has exhibited considerable human disturbance including illegal dumping and off-road activities. The western portion of the site is traversed by an intermittent stream channel, designated as SPL-2017-00143. According to the EPA's database, this stream *is not* classified as a "Water of the U.S." by the U.S. Army Corps of Engineers. The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>48</sup>

Growth-inducing impacts are generally associated with the provision of urban services to an undeveloped or rural area. Growth-inducing impacts include the following:

- *New development in an area presently undeveloped and economic factors which may influence development.* The site is currently undeveloped and undisturbed. All land use surrounding the property has been designated as Manufacturing/Industrial (MI) Light Manufacturing (LM)
- *Extension of roadways and other transportation facilities.* Future roadway and infrastructure connections will serve the proposed project site only. The existing, as well as approximately 2 miles of roadway that serves the project site will need to be improved, including an additional lane along

<sup>48</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.

Koala Road heading north from Rancho Road.

- *Extension of infrastructure and other improvements.* The installation of any new utility lines will not lead to subsequent offsite development since these utility connections will serve the site only. The project's potential utility impacts are analyzed in Section 3.19.
- *Major off-site public projects (treatment plants, etc.).* The project's increase in demand for utility services can be accommodated without the construction or expansion of landfills, water treatment plants, or wastewater treatment plants. The project's potential utility impacts are further analyzed in Section 3.19.
- *The removal of housing requiring replacement housing elsewhere.* The site does not contain any housing units. As a result, no replacement housing will be required.
- *Additional population growth leading to increased demand for goods and services.* The project will result in a limited increase in employment which can be accommodated by the local labor market. The cultivation facility is projected to employ 90-100 persons at full capacity. The hours of on-site operations for the proposed new development will be Monday through Friday, 8:00 AM to 5:00 PM.
- *Short-term growth-inducing impacts related to the project's construction.* The project will result in temporary employment during the construction phase.

The proposed project will utilize existing roadways and infrastructure. The newly established roads and existing utility lines will serve the project site only and will not extend into undeveloped areas. The proposed project will not result in any unplanned growth. Therefore, no impacts will result.

**B.** *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?* • **No Impact.**

The project site is vacant and undisturbed. This property and surrounding areas have a General Plan and zoning designations of Manufacturing/Industrial (MI). No housing units will be permitted, and none will be displaced as a result of the proposed project's implementation. Therefore, no impacts will result.

## **MITIGATION MEASURES**

The analysis of potential population and housing impacts indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

### 3.15 PUBLIC SERVICES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for: fire protection; police protection; schools; parks; or other public facilities?			×	

#### ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in fire protection; police protection; schools; parks; or other public facilities? • Less than Significant Impact.*

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The project site is currently vacant and undeveloped and contains a disturbed creosote bush community that supports vegetation such as Nevada joint fir, silver cholla, Joshua tree, rubber rabbitbrush, California buckwheat, and paper bag plant. The site has exhibited considerable human disturbance including illegal dumping and off-road activities. The western portion of the site is traversed by an intermittent stream channel, designated as SPL-2017-00143. According to the EPA's database, this stream *is not* classified as a "Water of the U.S." by the U.S. Army Corps of Engineers. The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>49</sup>

#### Fire Department

The City of Adelanto contracts fire protection services with the San Bernardino County Fire Department from two fire stations located within the City limits. The Fire Department currently reviews all new development plans. The proposed project will be required to conform to all fire protection and prevention requirements, including, but not limited to, building setbacks, emergency access, and fire flow (or the flow rate of water that is available for extinguishing fires). The proposed project would only place an incremental demand on fire services since the project will be constructed with strict adherence to all pertinent building and fire codes. In addition, the proposed project would be required to implement all

<sup>49</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.

pertinent Fire Code Standards including the installation of fire hydrants and sprinkler systems inside the buildings. Furthermore, the project will be reviewed by City and County Fire officials to ensure adequate fire service and safety as a result of project implementation. As a result, the potential impacts to fire protection services will be less than significant.

### **Law Enforcement**

Law enforcement services within the City are provided by the San Bernardino County Sheriff's Department which serves the community from one police station located .78 miles to the southwest of the project site. The proposed project will not be open or be accessible to the general public. On-site security will include security personnel, gates, cameras, and detailed background checks of employees. The facility will be closed to the public at all times. Non-employees will only be allowed to enter the facility with a permitted escort. The proposed facility will also be required to comply with the County and City security requirements. As a result, the potential impacts to law enforcement services will be less than significant.

### **Schools**

Due to the nature of the proposed project, no direct enrollment impacts regarding school services will occur. The proposed project will not directly increase demand for school services. As a result, the impacts on school-related services will be less than significant.

### **Recreational Services**

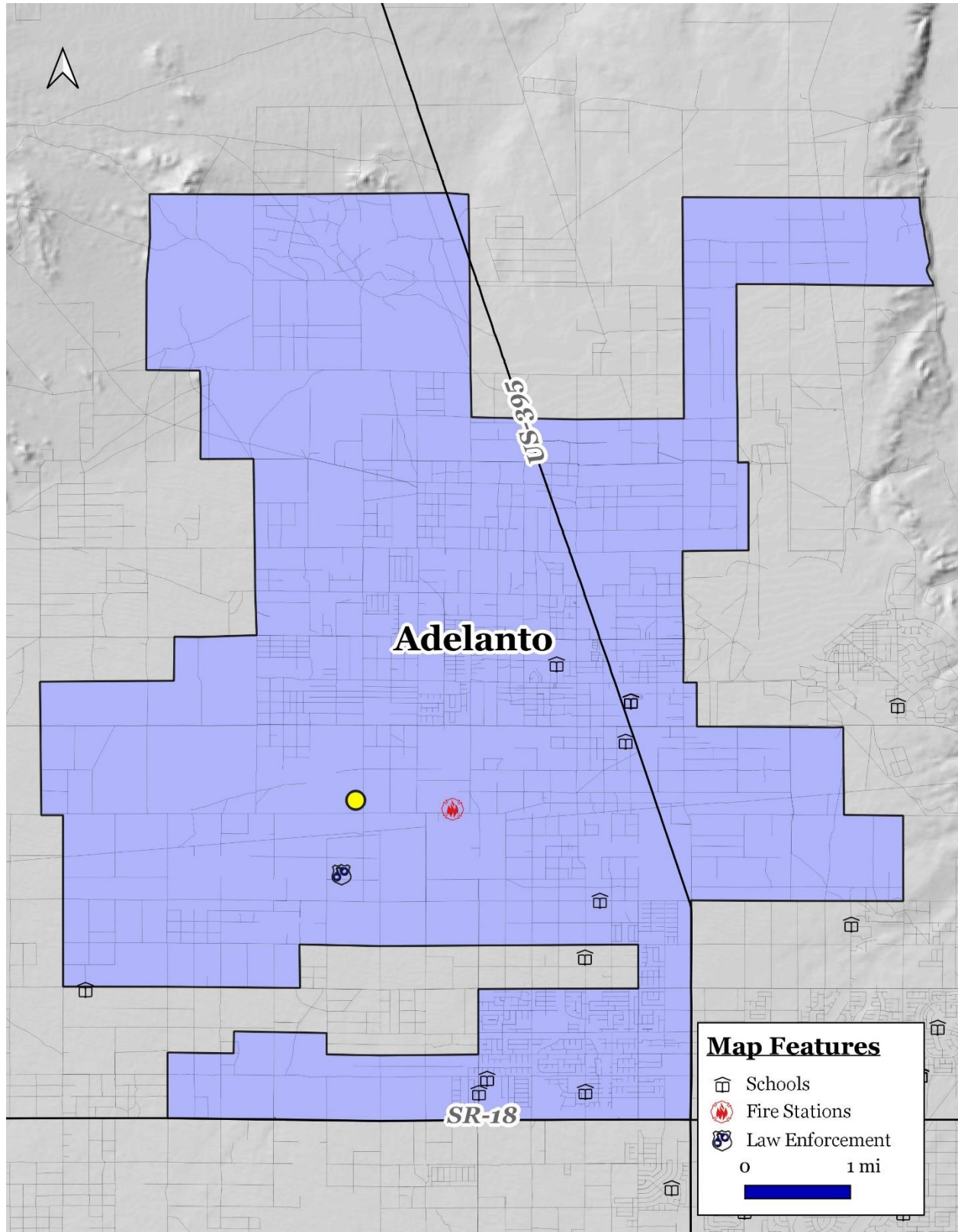
The proposed project will not result in any local increase in residential development (directly or indirectly) which could potentially impact the local recreational facilities. As a result, less than significant impacts on parks will result from the proposed project's implementation.

### **Governmental Services**

The proposed project will not create direct local population growth which could potentially create demand for other governmental service. As a result, less than significant impacts will result from the proposed project's implementation.

### **MITIGATION MEASURES**

The analysis of public service impacts indicated that no significant adverse impacts are anticipated, and no mitigation is required with the implementation of the proposed project.



**EXHIBIT 3-8**  
**PUBLIC SERVICES MAP**  
SOURCE: CITY OF ADELANTO



### 3.16 RECREATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				✗
B. Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✗

#### ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?* • No Impact.

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The site has exhibited considerable human disturbance including illegal dumping and off-road activities. The western portion of the site is traversed by an intermittent stream channel, designated as SPL-2017-00143. According to the EPA's database, this stream is *not* classified as a "Water of the U.S." by the U.S. Army Corps of Engineers. The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>50</sup> Due to the industrial nature of the proposed project, no significant increase in the use of City parks and recreational facilities is anticipated to occur. No parks are located adjacent to the site. The nearest public park, Richardson Park, is located approximately 2.5 miles northeast of the project site. The proposed project would not result in any improvements that would potentially significantly physically alter any public park facilities and services. As a result, no impacts are anticipated.

- B. *Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?* • No Impact.

<sup>50</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.

As previously indicated, the implementation of the proposed project would not affect any existing parks and recreational facilities in the city. No such facilities are located adjacent to the project site and, as a result, no impacts will occur.

### **MITIGATION MEASURES**

The analysis of potential impacts related to parks and recreation indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

### 3.17 TRANSPORTATION

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project conflict with a plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			×	
B. Conflict or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)?				×
C. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			×	
D. Would the project result in inadequate emergency access?				×

#### ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? • Less than Significant Impact.*

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The project site is currently vacant and undeveloped and contains a disturbed creosote bush community that supports vegetation such as Nevada joint fir, silver cholla, Joshua tree, rubber rabbitbrush, California buckwheat, and paper bag plant. The site has exhibited considerable human disturbance including illegal dumping and off-road activities. The western portion of the site is traversed by an intermittent stream channel, designated as SPL-2017-00143. According to the EPA's database, this stream is *not* classified as a "Water of the U.S." by the U.S. Army Corps of Engineers. The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>51</sup>

The key operational assumptions used in determining potential daily traffic generation are summarized below:

- The proposed project will operate the cannabis cultivation, manufacturing and distribution facility from 8:00 AM to 5:00 PM, Monday through Friday. A total of between 150 and 180 full-time staff will be on-site though the facility will be closed to the public at all times. Non-employees such as

<sup>51</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.

vendors, delivery persons, and maintenance personnel, will only be allowed to enter the facility with a permitted escort.

- The existing full-time security guards will continue to be stationed at the facility 24 hours a day, seven days a week.

The total trip generation assumed 300 trip ends (150 round trips) per day for the employees and 16 trip ends (8 round trips) per day for the vendors. A maximum of 316 new trip ends per day are anticipated for the proposed project. As a result, the impacts will be less than significant.

**B. *Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?*** • *No Impact.*

CEQA Guidelines Section 15064.3 subdivision (b)(2) focuses on impacts that result from certain transportation projects. The proposed project is not a transportation project. As a result, no impacts on this issue will result. CEQA Guidelines Section 15064.3 subdivision (b)(3) and (b)(4) focuses on the evaluation of a project's VMT. As previously mentioned in Subsection A, the proposed project will not create a significant amount of traffic in the surrounding area. As a result, the proposed project will not result in a conflict or be inconsistent with Section 15064.3 subdivision (b) of the CEQA Guidelines and no impacts will occur.

**C. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*** • *Less than Significant Impact.*

Access to the project site would be provided by an improved road that will be located along the site's east side (Koala Road). The proposed project will not expose future drivers to dangerous intersections or sharp curves and the proposed project will not introduce incompatible equipment or vehicles to the adjacent roads. As a result, the potential impacts will be less than significant.

**D. *Would the project result in inadequate emergency access?*** • *No Impact.*

The proposed project would not affect emergency access to any adjacent parcels. At no time during construction will adjacent streets, Koala Road or Rancho Road, be completely closed to traffic. All construction staging must occur on-site. As a result, no impacts are associated with the proposed project's implementation.

## **MITIGATION MEASURES**

The analysis of potential impacts related to traffic and circulation indicated that no significant adverse impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation measures are required.

### 3.18 TRIBAL CULTURAL RESOURCES

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place?			×	
B. Would the project cause a substantial adverse change in the significance of an object with cultural value to a California Native American Tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe 5020.1(k)?				×

#### ANALYSIS OF ENVIRONMENTAL IMPACTS

- A. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place?, or object with cultural value to a California Native American Tribe, and that is: listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe? • Less than Significant Impact.*

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The site has exhibited considerable human disturbance including illegal dumping and off-road activities. The western portion of the site is traversed by an intermittent stream channel, designated as SPL-2017-00143. According to the EPA's database, this stream is *not* classified as a "Water of the U.S." by the U.S. Army Corps of Engineers. The property has a General Plan and Zoning land use designation of

Manufacturing/Industrial (MI).<sup>52</sup> The proposed project site is located on a 3-acre parcel that is currently vacant and undisturbed. A Tribal Resource is defined in Public Resources Code section 21074 and includes the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
- A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “non-unique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms to the criteria of subdivision (a).

Adherence to the standard condition presented in Subsection B under Cultural Resources will minimize potential impacts to levels that are less than significant.

**B.** *Would the project cause a substantial adverse change in the significance of an object with cultural value to a California Native American Tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe 5020.1(k)?* • **No Impact.**

The project site is located on recognized Yuhaaviatam/Maarenga'yam (Serrano) ancestral territory. A search of the National Register of Historic Places and the list of California Historical Resources was conducted, and it was determined that no Native historic resources were listed within the City of Adelanto. Since the project's implementation will not impact any Federal, State, or locally designated historic resources, no impacts will occur.

## MITIGATION MEASURES

Adherence to the standard condition presented in Subsection B under Cultural Resources will minimize potential impacts to levels that are less than significant. As a result, no mitigation is required.

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<sup>52</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.

### 3.19 UTILITIES AND SERVICE SYSTEMS

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
<b>A.</b> Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			✗	
<b>B.</b> Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			✗	
<b>C.</b> Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✗	
<b>D.</b> Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✗	
<b>E.</b> Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?				✗

### ANALYSIS OF ENVIRONMENTAL IMPACTS

- A.** *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? • Less than Significant Impact.*

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The site has exhibited considerable human disturbance including illegal dumping and off-road activities. The western portion of the site is traversed by an intermittent stream channel, designated as SPL-2017-00143. According to the EPA's database, this stream is *not* classified as a "Water of the U.S." by the U.S. Army Corps of Engineers. The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>53</sup> There are no existing water or wastewater treatment plants, electric power plants, telecommunications facilities, natural gas facilities, or stormwater drainage infrastructure

<sup>53</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.

located on-site. Therefore, the project's implementation will not require the relocation of any of the aforementioned facilities. The project site is currently undeveloped and has existing electrical connections adjacent to the project site. The proposed project will connect to sanitary sewers. A new 6-inch sewer line will connect to an existing line in Koala Road. As a result, no impacts associated with the use of septic tanks will occur.

As a result, the potential impacts will be less than significant.

**B.** *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? • Less than Significant Impact.*

The City of Adelanto Water Department (AWD) provides water service and wastewater service to approximately 34,049 residents of Adelanto. The AWD employs a staff of twelve to manage and maintain the Department and its water resources. The Director of Public Utilities and the five-member Public Utilities Authority are responsible for providing adequate water services to the City. According to the City's 2015 Urban Water Management Plan, the City is projected to have an adequate supply of water to meet the increase in demand. In addition, the City is projected to have enough water to meet demand during a single dry year, and a multiple dry year scenario.<sup>54</sup> The project's implementation will require the site's connection to the City's water and sewer line in Koala Road. A new 4-inch water line and 6-inch sewer line will be constructed. There are existing water lines located on Rancho Road and Koala Road and existing sewer lines along Koala Road running in a north and south direction.<sup>55</sup> The project's implementation will require the establishment of a water well and sewer septic tank. The indoor agricultural areas will utilize an automated irrigation system. The medicinal cannabis will be cultivated, harvested, dried, packaged, stored, and distributed from this facility. In addition, the project will be equipped with water efficient fixtures and hydroponics. As a result, the impacts will be less than significant.

**C.** *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? • Less than Significant Impact.*

The City operates a 1.5-million-gallons-per-day activated sludge wastewater treatment facility through an operations and maintenance contract with PERC Water Corporation. In addition to operations, PERC performs routine collection system cleaning, sewage spill response and cleanup, and industrial sewage pretreatment program. The City is currently constructing a 2.5-million-gallons-per-day upgrade that will increase wastewater treatment capabilities to 4.0 million gallons per day and produce treated water that can be used for lawn/public parks irrigation, construction and dust control and other beneficial uses. The project's implementation will require the site's connection to the City's water and sewer line in Koala Road. A new 4-inch water line and 6-inch sewer line will be constructed. As a result, the impacts are expected to be less than significant.

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<sup>54</sup> City of Adelanto. 2015 Urban Water Management Plan. Report dated June 22, 2016.

<sup>55</sup> City of Adelanto. City of Adelanto Existing Sewer and Water.

<sup>45</sup> Census Quickfacts Adelanto City California



- D.** *Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? • Less than Significant Impact.*

The cannabis waste will be controlled using a “track and trace” system. In addition, licensed waste haulers must remove the organic waste. Other conventional solid waste may be handled by commercial waste disposal companies. As a result, the potential impacts will be less than significant.

- E.** *Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste? • No Impact.*

The proposed project, like all other development in Adelanto and San Bernardino County, will be required to adhere to City and County ordinances with respect to waste reduction and recycling. As a result, no impacts related to State and local statutes governing solid waste are anticipated.

### **MITIGATION MEASURES**

The analysis of utilities impacts indicated that no significant adverse impacts would result from the proposed project’s approval and subsequent implementation. As a result, no mitigation is required.

### 3.20 WILDFIRE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
A. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?				×
B. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				×
C. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				×
D. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				×

#### ANALYSIS OF ENVIRONMENTAL IMPACTS

A. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?* • No Impact.

The proposed project involves the development of a 6.05-acre (263,730 square-foot) site within the southcentral portion of the City of Adelanto. The proposed project involves the construction of eight (8), two-story buildings that would be used for cannabis cultivation, distribution, and manufacturing. The total floor area of the new buildings would be 214,608 square-feet. In addition, 185 standard parking spaces and 16 ADA compliant stalls would be provided. Vehicular access to the proposed development would be provided by driveway connections with the future Violet Road (on the north) and Koala Road (on the east). The project site is currently vacant and undeveloped and contains a disturbed creosote bush community that supports vegetation such as Nevada joint fir, silver cholla, Joshua tree, rubber rabbitbrush, California buckwheat, and paper bag plant. The site has exhibited considerable human disturbance including illegal dumping and off-road activities. The western portion of the site is traversed by an intermittent stream channel, designated as SPL-2017-00143. According to the EPA's database, this stream *is not* classified as a "Water of the U.S." by the U.S. Army Corps of Engineers. The property has a General Plan and Zoning land use designation of Manufacturing/Industrial (MI).<sup>56</sup> Surface streets that will be improved at construction

<sup>56</sup> Blue Engineering & Consulting Inc. *Koala Road P3 Development [Site Plan] Sheet 2*. October 25, 2021.

will serve the project site and adjacent area. Furthermore, the proposed project would not involve the closure or alteration of any existing evacuation routes that would be important in the event of a wildfire. At no time during construction will adjacent streets be completely closed to traffic. All construction staging must occur on-site. As a result, no impacts will occur.

- B.** *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? • No Impact.*

The project site is located in the midst of an urbanized zoned area. The proposed project may be exposed to particulate emissions generated by wildland fires in the mountains (the site is located approximately 20 miles north and northwest of the San Gabriel and San Bernardino Mountains). However, the potential impacts would not be exclusive to the project site since criteria pollutant emissions from wildland fires may affect the entire City as well as the surrounding cities and unincorporated county areas. As a result, no impacts will occur.

- C.** *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? • No Impact.*

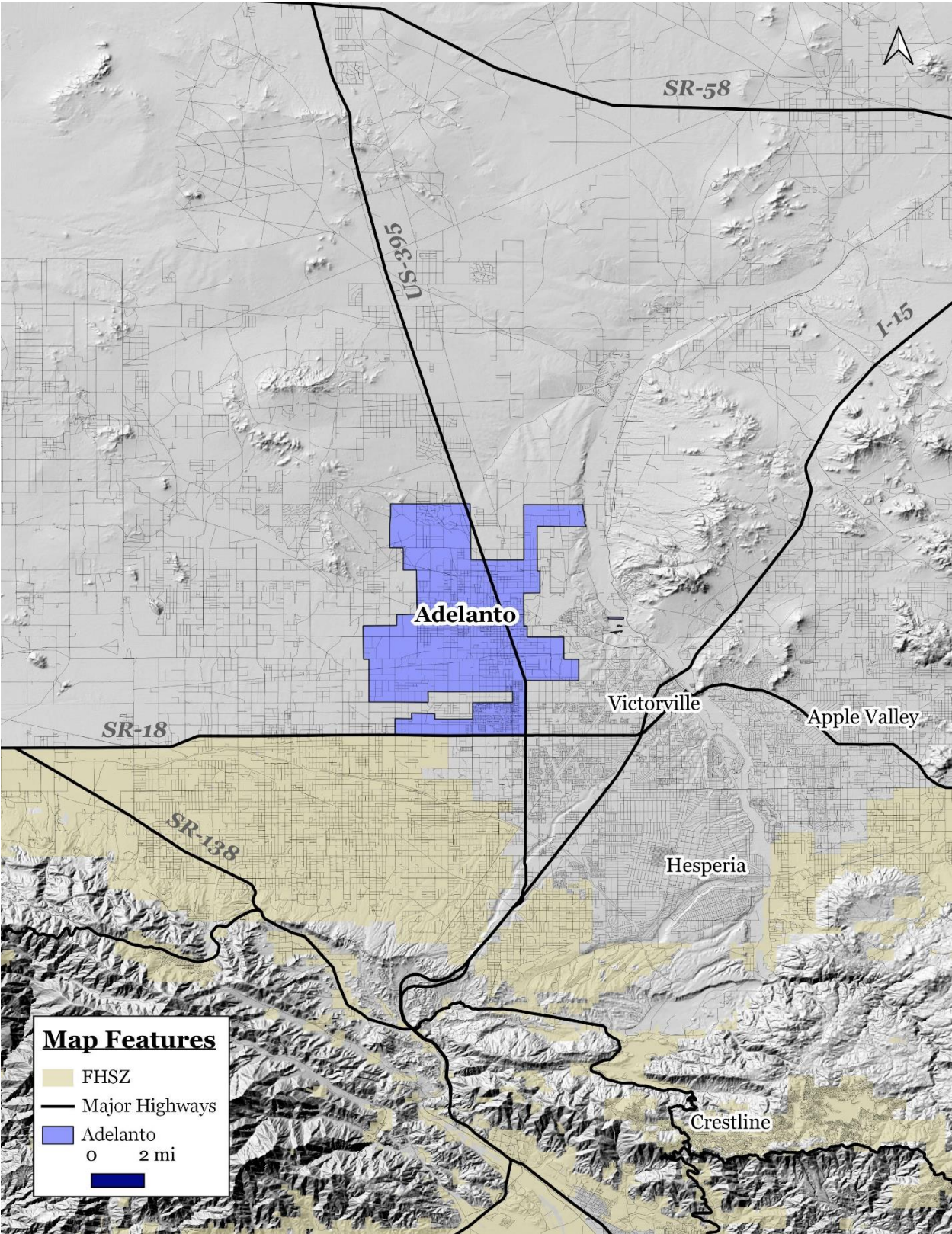
The project site is not located in an area that is classified as a moderate fire risk severity within a State Responsibility Area (SRA), and therefore will not require the installation of specialized infrastructure such as fire roads, fuel breaks, or emergency water sources. As a result, no impacts will occur.

- D.** *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? • No Impact.*

There is no risk from wildfire within the project site or the surrounding area given the project site's distance from any area that may be subject to a wildfire event. In addition, the site is located within a moderate fire risk and state responsibility area. Therefore, the project will not expose future employees to flooding or landslides facilitated by runoff flowing down barren and charred slopes and no impacts will occur.

## MITIGATION MEASURES

The analysis of wildfires impacts indicated that less than significant impacts would result from the proposed project's approval and subsequent implementation. As a result, no mitigation is required.



**EXHIBIT 3-9**  
**FIRE HAZARD SEVERITY ZONE MAP**  
SOURCE: CALIFORNIA DEPARTMENT OF FORESTRY

### 3.21 MANDATORY FINDINGS OF SIGNIFICANCE

Environmental Issue Areas Examined	Potentially Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
<b>A.</b> Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				×
<b>B.</b> Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				×
<b>C.</b> Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				×

The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this environmental assessment:

- A.** The proposed project *will not* have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. As indicated in Section 3.1 through 3.20, the proposed project will not result in any significant unmitigable environmental impacts.
- B.** The proposed project *will not* have impacts that are individually limited, but cumulatively considerable. The environmental impacts will not lead to a cumulatively significant impact on any of the issues analyzed herein.
- C.** The proposed project *will not* have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. As indicated in Section 3.1 through 3.20, the proposed project will not result in any significant unmitigable environmental impacts.



## SECTION 4 CONCLUSIONS

### 4.1 FINDINGS

The Initial Study determined that the proposed project is not expected to have significant adverse environmental impacts. The following findings can be made regarding the Mandatory Findings of Significance set forth in Section 15065 of the CEQA Guidelines based on the results of this Initial Study:

- The proposed project *will not* have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare or threatened species or eliminate important examples of the major periods of California history or prehistory.
- The proposed project *will not* have impacts that are individually limited, but cumulatively considerable.
- The proposed project *will not* have environmental effects which will cause substantially adverse effects on human beings, either directly or indirectly.

### 4.2 MITIGATION MONITORING

Section 21081(a) of the Public Resources Code states that findings must be adopted by the decision-makers coincidental to the approval of a Mitigated Negative Declaration. These findings shall be incorporated as part of the decision-maker's findings of fact, in response to AB-3180. In accordance with the requirements of Section 21081(a) and 21081.6 of the Public Resources Code, the following additional findings may be made:

- A mitigation reporting or monitoring program will be required;
- Site plans and/or building plans, submitted for approval by the responsible monitoring agency, shall include the required standard conditions; and,
- An accountable enforcement agency or monitoring agency shall be identified for the mitigations adopted as part of the decision-maker's final determination.

The analysis determined the following mitigation would be required.

*Air Quality Mitigation Measure No. 1.* The Applicant will be required to prepare an Odor Management Plan that must be approved by the City of Adelanto and San Bernardino County Department of Public Health. The Odor Management Plan must be approved prior to the issuance of an Occupancy Permit.

*Air Quality Mitigation Measure No. 2.* Indoor air must be filtered so as to remove VOCs from the indoor air envelope. The filtration equipment must be installed prior to the issuance of an Occupancy Permit.

The analysis of biological impacts determined that the following mitigation measures would be required to reduce the project's impacts to levels that would be less than significant.



*Biological Resources Mitigation Measure No. 1.* If construction occurs during the non-nesting season (typically September 16 through December 31), a pre-construction sweep shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity sweep within the Project areas (including access routes) and a 300-foot buffer surrounding the Project areas, within 2 hours prior to initiating Project activities. If project activities are planned during bird nesting season (generally, raptor nesting season is January 1 through September 15; and passerine bird nesting season is February 1 through September 1, a nesting bird survey shall be conducted by a qualified biologist within no more than three (3) days prior to the initiation of project activities, including, but not limited to clearing, grubbing, and/or rough grading to prevent impacts to birds and their nests. If nesting bird activity is present, a no disturbance buffer zone shall be established by the qualified biologist around each nest. The buffer shall be a minimum of 300 feet for raptors and 100 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. If there is no nesting activity, then no further action is need for this measure.

*Biological Resources Mitigation Measure No. 2.* Prior to grading or any other ground-disturbing activity, a pre-construction burrowing owl clearance survey must be conducted in accordance with the Staff Report on Burrowing Owl Mitigation, State of California Natural Resource Agency, Department of Fish and Game, May 7, 2012, by a qualified biologist within 14 days prior to the beginning of project activities a secondary survey must be conducted by a qualified biologist within 24 hours prior to the beginning of project construction to determine if the project site contains burrowing owl or sign thereof to avoid any potential impacts to the species. The surveys shall include 100 percent coverage of the project site. If both surveys reveal no burrowing owls are present or sign thereof, no additional actions related to this measure are required and a letter shall be prepared by the qualified biologist documenting the results of the survey. The letter shall be submitted to CDFW prior to construction. If occupied active burrows or sign thereof are found within the development footprint during the pre-construction clearance survey, Biological Resources Mitigation Measure 3 shall also apply.

*Biological Resources Mitigation Measure No. 3.* If active burrows or signs thereof are found within the development footprint during the pre-construction clearance surveys, site-specific non-disturbance buffer zones shall be established by the qualified biologist shall be no less than 300 feet If determined appropriate, a smaller buffer may be established by the qualified biologist following monitoring and assessments of the Project's effects on the burrowing owls. If it is not possible to avoid active burrows, passive relocation shall be implemented if a qualified biologist has determined there are no nesting owls and/or juvenile owls are no longer dependent on the burrows. A qualified biologist, in coordination with the applicant and the City, shall prepare and submit a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the CDFW's Staff Report on Burrowing Owl Mitigation (CDFG 2012) for CDFW review/approval prior to the commencement of disturbance activities onsite and proposed mitigation for permanent loss of occupied burrow(s) and habitat consistent with the 2012 Staff Report on Burrowing Owl Mitigation. When a qualified biologist determines that burrowing owls are no longer occupying the Project site and passive relocation is complete, construction activities may begin. A final letter report shall be prepared by the qualified biologist documenting the results of the passive relocation. The letter shall be submitted to CDFW.

*Biological Resources Mitigation Measure No. 4.* The project Applicant will be required to obtain a



California Endangered Species Act (CESA) Incidental Take Permit (ITP) from the State of California Department of Fish and Wildlife (CDFW) related to the removal, replanting or any development activity that may affect the Joshua Trees located on-site, around each western Joshua tree parent, seedling, and sprout. No project activities may occur within the buffer. Should avoidance be infeasible (during candidacy or if the species is listed under CESA), CDFW recommends that the Project Proponent apply for an Incidental Take Permit from CDFW prior to initiating Project activities.

*Biological Resources Mitigation Measure No. 5.* Pre-construction surveys following the Mohave Ground Squirrel Survey Guidelines (CDFG 2010) or most recent version shall be performed by a qualified biologist authorized by a Memorandum of Understanding issued by CDFW. The pre-construction surveys shall cover the Project Area and a 50-foot buffer zone. Should Mohave ground squirrel presence be confirmed during the survey, the Project Proponent should obtain an ITP for Mohave ground squirrel prior to the start of Project activities. CDFW shall be notified if Mohave ground squirrel presence is confirmed during the pre-construction survey. If a Mohave ground squirrel is observed during Project activities, and the Project Proponent does not have an ITP, all work shall immediately stop, and the observation shall be immediately reported to CDFW.

*Biological Resources Mitigation Measure No. 6.* A CDFW-approved biologist shall conduct a protocol level presence or absence survey within the Project area and 50-foot buffer no more than 48 hours prior to Project activities during desert tortoise active season (April to May or September to October), in accordance with the U.S. Fish and Wildlife Service 2019 desert tortoise survey methodology. The survey shall utilize perpendicular survey routes and 100-percent visual coverage for desert tortoise and their sign. Results of the survey shall be submitted to CDFW. If the survey confirms absence, the CDFW-approved biologist shall ensure desert tortoise do not enter the Project area. If the survey confirms presence, the Project proponent shall submit to CDFW for review and approval a desert tortoise-specific avoidance plan detailing the protective avoidance measures to be implemented to ensure complete avoidance of take to desert tortoise. If complete avoidance cannot be achieved, CDFW recommends Project proponent not undertake Project activities and Project activities be postponed until appropriate authorization (i.e., CESA ITP under Fish and Game Code section 2081) is obtained.

*Biological Resources Mitigation Measure No. 7.* Prior to Project implementation, and during the appropriate season, the City shall conduct botanical field survey following protocols set forth in the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). The surveys shall be conducted by a CDFW-approved botanist(s) experienced in conducting floristic botanical field surveys, knowledgeable of plant taxonomy and plant community ecology and classification, familiar with the plants of the area, including special status and locally significant plants, and familiar with the appropriate state and federal statutes related to plants and plant collecting. The botanical field surveys shall be conducted at the appropriate time of year when plants will both be evident and identifiable (usually, during flowering or fruiting) and, in a manner, which maximizes the likelihood of locating special status plants and sensitive natural communities that may be present. Botanical field surveys shall be conducted floristic in nature, meaning that every plant taxon that occurs in the project area is identified to the taxonomic level necessary to determine rarity and listing status. If any rare plants or sensitive vegetation communities are identified, the City shall either avoid the occurrence, with an appropriate buffer, or mitigate the loss of the occurrence through the purchase of mitigation credits from a CDFW-approved bank or land acquisition and conservation at a minimum 3:1 (replacement-to-impact) ratio. Note that

a higher ratio may be warranted if the proposed mitigation lands are located far away from the Project site (i.e., within a separate watershed) or is not occupied by or available to special status species. If the

Project has the potential to impact a State-listed species, the City should apply for a California Endangered Species Act Incidental Take Permit with the California Department of Fish and Wildlife.

*Biological Resources Mitigation Measure No. 8.* Prior to construction and issuance of any grading permit, the Project applicant should obtain written correspondence from the California Department of Fish and Wildlife (CDFW) stating that notification under section 1602 of the Fish and Game Code is not required for the Project, or the Project applicant should obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.

*Biological Resources Mitigation Measure No. 9.* Prior to construction and issuance of any grading permit, the City of Adelanto shall develop a plan with measures to avoid, minimize, or mitigate the impacts of pesticides used in cannabis cultivation, including fungicides, herbicides, insecticides, and rodenticides. The plan should include, but is not limited to, the following elements: (1) Proper use, storage, and disposal of pesticides, in accordance with manufacturers' directions and warnings. (2) Avoidance of pesticide use where toxic runoff may pass into waters of the State, including ephemeral streams. (3) Avoidance of pesticides that cannot legally be used on cannabis in the state of California, as set forth by the Department of Pesticide Regulation. (4) Avoidance of anticoagulant rodenticides and rodenticides with "flavorizers." (5) Avoidance of sticky/glue traps. (6) Inclusion of alternatives to toxic rodenticides, such as sanitation (removing food sources like pet food, cleaning up refuse, and securing garbage in sealed containers) and physical barriers.

*Biological Resources Mitigation Measure No. 10.* Light shall not be visible outside of any structure used for cannabis cultivation. This shall be accomplished by: employing blackout curtains where artificial light is used to prevent light escapement, eliminating all nonessential lighting from cannabis sites and avoiding or limiting the use of artificial light during the hours of dawn and dusk when many wildlife species are most active, ensuring that lighting for cultivation activities and security purposes is shielded, cast downward, and does not spill over onto other properties or upward into the night sky (see the International Dark-Sky Association standards at <http://darksky.org/>), and using LED lighting with a correlated color temperature of 3,000 Kelvins or less. All hazardous waste associated with lighting shall be disposed of properly and lighting that contains toxic compounds shall be recycled with a qualified recycler.

*Biological Resources Mitigation Measure No. 11.* Project construction shall not occur during the hours of dawn and dusk when many wildlife species are most active. To suppress Project noise, the Project shall implement the use of mufflers and all generators shall be enclosed.

*Cultural Resources Mitigation Measure No. 1.* Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City of Adelanto that a qualified archaeologist/paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.

*Cultural Resources Mitigation Measure No. 2.* The archaeologist/paleontologist monitor shall conduct

full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at or below four (4) feet below ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The archaeologist/paleontologist monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified archaeologist/paleontologist personnel to have a low potential to contain or yield fossil resources.

*Cultural Resources Mitigation Measure No. 3.* Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.

*Cultural Resources Mitigation Measure No. 4.* A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Adelanto prior to building final.

*Cultural Resources Mitigation Measure No.5.* In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted.

*Cultural Resources Mitigation Measure No. 6.* If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to SMBMI for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.

*Cultural Resources Mitigation Measure No. 7.* If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

*Cultural Resources Mitigation Measure No. 8.* The San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed in the mitigation measure, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with

SMBMI, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents SMBMI for the remainder of the project, should SMBMI elect to place a monitor on-site.

*Cultural Resources Mitigation Measure No. 9.* Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to SMBMI. The Lead Agency and/or applicant shall, in good faith, consult with SMBMI throughout the life of the project.

*Energy Mitigation Measure No. 1.* The project must employ, as much as possible, the use of glass or translucent plastic (corrugated polycarbonate 90% light transmission) materials on building roof and gables for greenhouse areas to allow natural daylight in work areas and for plant growth.

*Energy Mitigation Measure No. 2.* The project must use 90% Transmission materials internal walls in the greenhouse areas to allow natural daylight use.

*Energy Mitigation Measure No. 3.* The project must use motion activated lighting in the greenhouse areas to reduce energy use at night.

<b>Table 4-1</b> <b>Mitigation-Monitoring Program</b>			
Measure	Enforcement Agency	Monitoring Phase	Verification
<b>Air Quality Mitigation Measure No. 1.</b> The Applicant will be required to prepare an Odor Management Plan that must be approved by the City of Adelanto and San Bernardino County Department of Public Health. The Odor Management Plan must be approved prior to the issuance of an Occupancy Permit.	Director of Community Development • <i>(Applicant is responsible for implementation)</i>	<i>Over the project's operational lifetime</i> • Mitigation continues over the project's operational life.	Date:  Name & Title:
<b>Air Quality Mitigation Measure No. 2.</b> Indoor air must be filtered so as to remove VOCs from the indoor air envelope. The filtration equipment must be installed prior to the issuance of an Occupancy Permit. activities.	Community Development Director and California Fish & Wildlife • <i>(Applicant is responsible for implementation)</i>	<i>Over the project's operational lifetime</i> • Mitigation continues over the project's operational life.	Date:  Name & Title:

<p><b>Biological Resources Mitigation Measure No. 1.</b> If construction occurs during the non-nesting season (typically September 16 through December 31), a pre-construction sweep shall be performed to verify absence of nesting birds. A qualified biologist shall conduct the pre-activity sweep within the Project areas (including access routes) and a 300-foot buffer surrounding the Project areas, within 2 hours prior to initiating Project activities. If project activities are planned during bird nesting season (generally, raptor nesting season is January 1 through September 15; and passerine bird nesting season is February 1 through September 1, a nesting bird survey shall be conducted by a qualified biologist within no more than three (3) days prior to the initiation of project activities, including, but not limited to clearing, grubbing, and/or rough grading to prevent impacts to birds and their nests. If nesting bird activity is present, a no disturbance buffer zone shall be established by the qualified biologist around each nest. The buffer shall be a minimum of 300 feet for raptors and 100 feet for songbirds, unless a smaller buffer is specifically determined by a qualified biologist familiar with the nesting phenology of the nesting species. The buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. If there is no nesting activity, then no further action is need for this measure.</p>	<p style="text-align: center;">Community Development Director and California Fish &amp; Wildlife • (Applicant is responsible for implementation)</p>	<p style="text-align: center;"><i>Prior to the issuance of building permits.</i> • Mitigation ends when construction is completed.</p>	<p>Date:  Name &amp; Title:</p>
<p><b>Biological Resources Mitigation Measure No. 2.</b> Prior to grading or any other ground-disturbing activity, a pre-construction burrowing owl clearance survey must be conducted in accordance with the Staff Report on Burrowing Owl Mitigation, State of California Natural Resource Agency, Department of Fish and Game, May 7, 2012, by a qualified biologist within 14 days prior to the beginning of project activities a secondary survey must be conducted by a qualified biologist within 24 hours prior to the beginning of project construction to determine if the project site contains burrowing owl or sign thereof to avoid any potential impacts to the species. The surveys shall include 100 percent coverage of the project site. If both surveys reveal no burrowing owls are present or sign thereof, no additional actions related to this measure are required and a letter shall be prepared by the qualified biologist documenting the results of the survey. The letter shall be submitted to CDFW prior to construction. If occupied active burrows or sign thereof are found within the development footprint during the pre-construction clearance survey, Biological Resources Mitigation Measure 3 shall also apply.</p>	<p style="text-align: center;">Community Development Director and California Fish &amp; Wildlife • (Applicant is responsible for implementation)</p>	<p style="text-align: center;"><i>Prior to the issuance of grading permits.</i> • Mitigation ends when construction is completed.</p>	<p>Date:  Name &amp; Title:</p>

<p><b>Biological Resources Mitigation Measure No. 3.</b> If active burrows or signs thereof are found within the development footprint during the pre-construction clearance surveys, site-specific non-disturbance buffer zones shall be established by the qualified biologist shall be no less than 300 feet. If determined appropriate, a smaller buffer may be established by the qualified biologist following monitoring and assessments of the Project's effects on the burrowing owls. If it is not possible to avoid active burrows, passive relocation shall be implemented if a qualified biologist has determined there are no nesting owls and/or juvenile owls are no longer dependent on the burrows. A qualified biologist, in coordination with the applicant and the City, shall prepare and submit a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the CDFW's Staff Report on Burrowing Owl Mitigation (CDFG 2012) for CDFW review/approval prior to the commencement of disturbance activities onsite and proposed mitigation for permanent loss of occupied burrow(s) and habitat consistent with the 2012 Staff Report on Burrowing Owl Mitigation. When a qualified biologist determines that burrowing owls are no longer occupying the Project site and passive relocation is complete, construction activities may begin. A final letter report shall be prepared by the qualified biologist documenting the results of the passive relocation. The letter shall be submitted to CDFW.</p>	<p style="text-align: center;">Community Development Director and California Fish &amp; Wildlife • (Applicant is responsible for implementation)</p>	<p style="text-align: center;"><i>Prior to the issuance of grading permits.</i> • Mitigation ends when construction is completed.</p>	<p>Date:  Name &amp; Title:</p>
<p><b>Biological Resources Mitigation Measure No. 4.</b> The project Applicant will be required to obtain a California Endangered Species Act (CESA) Incidental Take Permit (ITP) from the State of California Department of Fish and Wildlife (CDFW) related to the removal, replanting or any development activity that may affect the Joshua Trees located on-site. around each western Joshua tree parent, seedling, and sprout. No project activities may occur within the buffer. Should avoidance be infeasible (during candidacy or if the species is listed under CESA), CDFW recommends that the Project Proponent apply for an Incidental Take Permit from CDFW prior to initiating Project activities.</p>	<p style="text-align: center;">Community Development Director and California Fish &amp; Wildlife • (Applicant is responsible for implementation)</p>	<p style="text-align: center;"><i>Prior to the issuance of grading permits.</i> • Mitigation ends when construction is completed.</p>	<p>Date:  Name &amp; Title:</p>
<p><b>Biological Resources Mitigation Measure No. 5.</b> Pre-construction surveys following the Mohave Ground Squirrel Survey Guidelines (CDFG 2010) or most recent version shall be performed by a qualified biologist authorized by a Memorandum of Understanding issued by CDFW. The pre-construction surveys shall cover the Project Area and a 50-foot buffer zone. Should Mohave ground squirrel presence be confirmed during the survey, the Project Proponent should obtain an ITP for Mohave ground squirrel prior to the start of Project activities. CDFW shall be notified if Mohave ground squirrel presence is confirmed during the pre-construction survey. If a Mohave ground squirrel is observed during Project activities, and the Project Proponent does not have an ITP, all work shall immediately stop, and the observation shall be immediately reported to CDFW.</p>	<p style="text-align: center;">Community Development Director and California Fish &amp; Wildlife • (Applicant is responsible for implementation)</p>	<p style="text-align: center;"><i>Prior to the issuance of grading permits.</i> • Mitigation ends when construction is completed.</p>	<p>Date:  Name &amp; Title:</p>

<p><b>Biological Resources Mitigation Measure No. 6. A</b> CDFW-approved biologist shall conduct a protocol level presence or absence survey within the Project area and 50-foot buffer no more than 48 hours prior to Project activities during desert tortoise active season (April to May or September to October), in accordance with the U.S. Fish and Wildlife Service 2019 desert tortoise survey methodology. The survey shall utilize perpendicular survey routes and 100-percent visual coverage for desert tortoise and their sign. Results of the survey shall be submitted to CDFW. If the survey confirms absence, the CDFW-approved biologist shall ensure desert tortoise do not enter the Project area. If the survey confirms presence, the Project proponent shall submit to CDFW for review and approval a desert tortoise-specific avoidance plan detailing the protective avoidance measures to be implemented to ensure complete avoidance of take to desert tortoise. If complete avoidance cannot be achieved, CDFW recommends Project proponent not undertake Project activities and Project activities be postponed until appropriate authorization (i.e., CESA ITP under Fish and Game Code section 2081) is obtained.</p>	<p style="text-align: center;">Community Development Director and California Fish &amp; Wildlife • (Applicant is responsible for implementation)</p>	<p style="text-align: center;"><i>Prior to the issuance of grading permits.</i> • Mitigation ends when construction is completed.</p>	<p>Date:  Name &amp; Title:</p>
<p><i>Biological Resources Mitigation Measure No. 7.</i> Prior to Project implementation, and during the appropriate season, the City shall conduct botanical field survey following protocols set forth in the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). The surveys shall be conducted by a CDFW-approved botanist(s) experienced in conducting floristic botanical field surveys, knowledgeable of plant taxonomy and plant community ecology and classification, familiar with the plants of the area, including special status and locally significant plants, and familiar with the appropriate state and federal statutes related to plants and plant collecting. The botanical field surveys shall be conducted at the appropriate time of year when plants will both be evident and identifiable (usually, during flowering or fruiting) and, in a manner, which maximizes the likelihood of locating special status plants and sensitive natural communities that may be present. Botanical field surveys shall be conducted floristic in nature, meaning that every plant taxon that occurs in the project area is identified to the taxonomic level necessary to determine rarity and listing status. If any rare plants or sensitive vegetation communities are identified, the City shall either avoid the occurrence, with an appropriate buffer, or mitigate the loss of the occurrence through the purchase of mitigation credits from a CDFW-approved bank or land acquisition and conservation at a minimum 3:1 (replacement-to-impact) ratio. Note that a higher ratio may be warranted if the proposed mitigation lands are located far away from the Project site (i.e., within a separate watershed) or is not occupied by or available to special status species. If the Project has the potential to impact a State-listed species, the City should apply for a California Endangered Species Act Incidental Take Permit with the California Department of Fish and Wildlife.</p>	<p style="text-align: center;">Community Development Director and California Fish &amp; Wildlife • (Applicant is responsible for implementation)</p>	<p style="text-align: center;"><i>Prior to the issuance of grading permits.</i> • Mitigation ends when construction is completed.</p>	<p>Date:  Name &amp; Title:</p>
<p><b>Biological Resources Mitigation Measure No. 8.</b> Prior to construction and issuance of any grading permit, the Project applicant should obtain written correspondence from the California Department of Fish and Wildlife (CDFW) stating that notification under section 1602 of the Fish and Game Code is not required for the Project, or the Project applicant should obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.</p>	<p style="text-align: center;">Community Development Director and California Fish &amp; Wildlife • (Applicant is responsible for implementation)</p>	<p style="text-align: center;"><i>Prior to the issuance of grading permits.</i> • Mitigation ends when construction is completed.</p>	<p>Date:  Name &amp; Title:</p>

<p><b>Biological Resources Mitigation Measure No. 9.</b> Prior to construction and issuance of any grading permit, the City of Adelanto shall develop a plan with measures to avoid, minimize, or mitigate the impacts of pesticides used in cannabis cultivation, including fungicides, herbicides, insecticides, and rodenticides. The plan should include, but is not limited to, the following elements: (1) Proper use, storage, and disposal of pesticides, in accordance with manufacturers' directions and warnings. (2) Avoidance of pesticide use where toxic runoff may pass into waters of the State, including ephemeral streams. (3) Avoidance of pesticides that cannot legally be used on cannabis in the state of California, as set forth by the Department of Pesticide Regulation. (4) Avoidance of anticoagulant rodenticides and rodenticides with "flavorizers." (5) Avoidance of sticky/glue traps. (6) Inclusion of alternatives to toxic rodenticides, such as sanitation (removing food sources like pet food, cleaning up refuse, and securing garbage in sealed containers) and physical barriers.</p>	<p style="text-align: center;">Community Development Director and California Fish &amp; Wildlife • (Applicant is responsible for implementation)</p>	<p style="text-align: center;"><i>Prior to the issuance of grading permits.</i> • Mitigation ends when construction is completed.</p>	<p>Date:  Name &amp; Title:</p>
<p><b>Biological Resources Mitigation Measure No. 10.</b> Light shall not be visible outside of any structure used for cannabis cultivation. This shall be accomplished by: employing blackout curtains where artificial light is used to prevent light escapement, eliminating all nonessential lighting from cannabis sites and avoiding or limiting the use of artificial light during the hours of dawn and dusk when many wildlife species are most active, ensuring that lighting for cultivation activities and security purposes is shielded, cast downward, and does not spill over onto other properties or upward into the night sky (see the International Dark-Sky Association standards at <a href="http://darksky.org/">http://darksky.org/</a>), and using LED lighting with a correlated color temperature of 3,000 Kelvins or less. All hazardous waste associated with lighting shall be disposed of properly and lighting that contains toxic compounds shall be recycled with a qualified recycler.</p>	<p style="text-align: center;">Community Development Director and California Fish &amp; Wildlife • (Applicant is responsible for implementation)</p>	<p style="text-align: center;"><i>Over the project's operational lifetime</i> • Mitigation continues over the project's operational life.</p>	<p>Date:  Name &amp; Title:</p>
<p><b>Biological Resources Mitigation Measure No. 11.</b> Project construction shall not occur during the hours of dawn and dusk when many wildlife species are most active. To suppress Project noise, the Project shall implement the use of mufflers and all generators shall be enclosed.</p>	<p style="text-align: center;">Community Development Director and California Fish &amp; Wildlife • (Applicant is responsible for implementation)</p>	<p style="text-align: center;"><i>Prior to the issuance of grading permits.</i> • Mitigation ends when construction is completed.</p>	<p>Date:  Name &amp; Title:</p>



<p><b>Cultural Resources Mitigation Measure No. 1.</b> Prior to the issuance of a grading permit, the Applicant shall provide evidence to the City of Adelanto that a qualified archaeologist/paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.</p>	<p>Community Development Director                      •  <i>(Applicant is responsible for implementation)</i></p>	<p><i>Prior to the issuance of grading permits.</i>                      •                      Mitigation ends when construction is completed.</p>	<p>Date:  Name &amp; Title:</p>
<p><b>Cultural Resources Mitigation Measure No. 2.</b> The archaeologist/paleontologist monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at or below four (4) feet below ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The archaeologist/paleontologist monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified archaeologist/paleontologist personnel to have a low potential to contain or yield fossil resources</p>	<p>Community Development Director                      •  <i>(Applicant is responsible for implementation)</i></p>	<p><i>Prior to the issuance of grading permits.</i>                      •                      Mitigation ends when construction is completed.</p>	<p>Date:  Name &amp; Title:</p>
<p><b>Cultural Resources Mitigation Measure No. 3.</b> Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the San Bernardino County Museum in San Bernardino, California, is required for significant discoveries. The archaeologist/paleontologist must have a written repository agreement in hand prior to initiation of mitigation activities.</p>	<p>Community Development Director                      •  <i>(Applicant is responsible for implementation)</i></p>	<p><i>Prior to the issuance of grading permits.</i>                      •                      Mitigation ends when construction is completed.</p>	<p>Date:  Name &amp; Title:</p>
<p><b>Cultural Resources Mitigation Measure No. 4.</b> A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Adelanto prior to building final.</p>	<p>Community Development Director                      •  <i>(Applicant is responsible for implementation)</i></p>	<p><i>Prior to the issuance of grading permits.</i>                      •                      Mitigation ends when construction is completed.</p>	<p>Date:  Name &amp; Title:</p>

<p><b>Cultural Resources Mitigation Measure No.5.</b> In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted.</p>	<p>Community Development Director</p> <p>•</p> <p><i>(Applicant is responsible for implementation)</i></p>	<p><i>Prior to the issuance of grading permits.</i></p> <p>•</p> <p>Mitigation ends when construction is completed.</p>	<p>Date:</p> <p>Name &amp; Title:</p>
<p><b>Cultural Resources Mitigation Measure No. 6.</b> If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to SMBMI for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.</p>	<p>Community Development Director</p> <p>•</p> <p><i>(Applicant is responsible for implementation)</i></p>	<p><i>Prior to the issuance of grading permits.</i></p> <p>•</p> <p>Mitigation ends when construction is completed.</p>	<p>Date:</p> <p>Name &amp; Title:</p>
<p><b>Cultural Resources Mitigation Measure No. 7.</b> If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.</p>	<p>Community Development Director</p> <p>•</p> <p><i>(Applicant is responsible for implementation)</i></p>	<p><i>Prior to the issuance of grading permits.</i></p> <p>•</p> <p>Mitigation ends when construction is completed.</p>	<p>Date:</p> <p>Name &amp; Title:</p>
<p><b>Cultural Resources Mitigation Measure No. 8.</b> The San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted, as detailed in the mitigation measure, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with SMBMI, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents SMBMI for the remainder of the project, should SMBMI elect to place a monitor on-site.</p>	<p>Community Development Director</p> <p>•</p> <p><i>(Applicant is responsible for implementation)</i></p>	<p><i>Prior to the issuance of grading permits.</i></p> <p>•</p> <p>Mitigation ends when construction is completed.</p>	<p>Date:</p> <p>Name &amp; Title:</p>

<p><b>Cultural Resources Mitigation Measure No. 9.</b> Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to SMBMI. The Lead Agency and/or applicant shall, in good faith, consult with SMBMI throughout the life of the project.</p>	<p>Community Development Director                      •  <i>(Applicant is responsible for implementation)</i></p>	<p><i>Prior to the issuance of grading permits.</i>                      •                      Mitigation ends when construction is completed.</p>	<p>Date:  Name &amp; Title:</p>
<p><b>Energy Mitigation Measure No. 1.</b> The project must employ, as much as possible, the use of glass or translucent plastic (corrugated polycarbonate 90% light transmission) materials on building roof and gables for greenhouse areas to allow natural daylight in work areas and for plant growth.</p>	<p>Community Development Director                      •  <i>(Applicant is responsible for implementation)</i></p>	<p><i>Over the project's operational lifetime</i>                      •                      Mitigation continues over the project's operational life.</p>	<p>Date:  Name &amp; Title:</p>
<p><b>Energy Mitigation Measure No. 2.</b> The project must use 90% Transmission materials internal walls in the greenhouse areas to allow natural daylight use.</p>	<p>Community Development Director                      •  <i>(Applicant is responsible for implementation)</i></p>	<p><i>Over the project's operational lifetime</i>                      •                      Mitigation continues over the project's operational life.</p>	<p>Date:  Name &amp; Title:</p>
<p><b>Energy Mitigation Measure No. 3.</b> The project must use motion activated lighting in the greenhouse areas to reduce energy use at night.</p>	<p>Community Development Director                      •  <i>(Applicant is responsible for implementation)</i></p>	<p><i>Over the project's operational lifetime</i>                      •                      Mitigation continues over the project's operational life.</p>	<p>Date:  Name &amp; Title:</p>

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## **SECTION 5 REFERENCES**

### **5.1 PREPARERS**

Blodgett Baylosis Environmental Planning  
2211 S Hacienda Boulevard, Suite 107  
Hacienda Heights, CA 91745  
(626) 336-0033

Marc Blodgett, Project Principal  
Karla Nayakarathne, Project Geographer

### **5.2 REFERENCES**

The references that were consulted have been identified using footnotes.

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## **APPENDIX A – AIR QUALITY WORKSHEETS**

INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION  
KOALA LA, LLC • APN 3210-631-012 & 013 • CUP 21-22, LDP 21-22, & TPM 20454 • CITY OF ADELANTO

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ADLT 054 - Mojave Desert Air Basin, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

**ADLT 054**

Mojave Desert Air Basin, Summer

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Manufacturing	214.61	1000sqft	6.05	214,608.00	0

**1.2 Other Project Characteristics**

Urbanization	Urban	Wind Speed (m/s)	2.6	Precipitation Freq (Days)	31
Climate Zone	10			Operational Year	2023
Utility Company	Southern California Edison				
CO2 Intensity (lb/MW hr)	390.98	CH4 Intensity (lb/MW hr)	0.033	N2O Intensity (lb/MW hr)	0.004

**1.3 User Entered Comments & Non-Default Data**

Project Characteristics -

Land Use - 6.05 ACRE SITE

Construction Phase - construction characteristics

Off-road Equipment - no demolition

Grading - 6.05 acre site

Architectural Coating - Low VOC paint

Area Mitigation - low VOC paint

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	250.00	50.00
tblArchitecturalCoating	EF_Parking	250.00	50.00
tblAreaMitigation	UseLowVOCPaintNonresidentialExteriorValue	250	50



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblAreaMitigation	UseLowVOCPaintNonresidentialInteriorValue	250	50
tblAreaMitigation	UseLowVOCPaintParkingCheck	False	True
tblAreaMitigation	UseLowVOCPaintParkingValue	250	50
tblConstructionPhase	NumDays	20.00	30.00
tblConstructionPhase	NumDays	230.00	150.00
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	20.00	30.00
tblConstructionPhase	NumDays	20.00	30.00
tblConstructionPhase	NumDays	10.00	30.00
tblConstructionPhase	PhaseEndDate	3/22/2024	4/5/2024
tblConstructionPhase	PhaseEndDate	1/26/2024	10/6/2023
tblConstructionPhase	PhaseEndDate	1/27/2023	12/30/2022
tblConstructionPhase	PhaseEndDate	3/10/2023	3/24/2023
tblConstructionPhase	PhaseEndDate	2/23/2024	3/8/2024
tblConstructionPhase	PhaseEndDate	2/10/2023	3/10/2023
tblGrading	AcresOfGrading	30.00	6.05
tblGrading	AcresOfGrading	45.00	6.05
tblLandUse	LotAcreage	4.93	6.05
tblOffRoadEquipment	HorsePower	81.00	0.00
tblOffRoadEquipment	HorsePower	158.00	0.00
tblOffRoadEquipment	HorsePower	247.00	0.00
tblOffRoadEquipment	LoadFactor	0.73	0.00
tblOffRoadEquipment	LoadFactor	0.38	0.00
tblOffRoadEquipment	LoadFactor	0.40	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	UsageHours	8.00	0.00
tblOffRoadEquipment	UsageHours	8.00	0.00

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tbOffRoadEquipment	:	UsageHours	:	8.00	:	0.00
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2.0 Emissions Summary

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**2.1 Overall Construction (Maximum Daily Emission)**

**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	4.4910	45.5261	34.6920	0.0714	24.7872	2.0423	26.8295	13.3590	1.8789	15.2379	0.0000	6,961.1860	6,961.1860	2.1288	0.1226	7,036.7762
2024	133.9083	10.8020	17.3331	0.0282	0.2711	0.5307	0.8018	0.0719	0.4931	0.5650	0.0000	2,735.9817	2,735.9817	0.7362	6.1400e-003	2,756.2175
Maximum	133.9083	45.5261	34.6920	0.0714	24.7872	2.0423	26.8295	13.3590	1.8789	15.2379	0.0000	6,961.1860	6,961.1860	2.1288	0.1226	7,036.7762

**Mitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2023	4.4910	45.5261	34.6920	0.0714	24.7872	2.0423	26.8295	13.3590	1.8789	15.2379	0.0000	6,961.1860	6,961.1860	2.1288	0.1226	7,036.7762
2024	133.9083	10.8020	17.3331	0.0282	0.2711	0.5307	0.8018	0.0719	0.4931	0.5650	0.0000	2,735.9817	2,735.9817	0.7362	6.1400e-003	2,756.2175
Maximum	133.9083	45.5261	34.6920	0.0714	24.7872	2.0423	26.8295	13.3590	1.8789	15.2379	0.0000	6,961.1860	6,961.1860	2.1288	0.1226	7,036.7762

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**2.2 Overall Operational**

**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	5.9573	2.0000e-004	0.0219	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0470	0.0470	1.2000e-004		0.0501
Energy	0.2050	1.8636	1.5655	0.0112		0.1416	0.1416		0.1416	0.1416		2,236.3503	2,236.3503	0.0429	0.0410	2,249.6398
Mobile	5.2385	6.5652	44.8185	0.0904	8.4992	0.0781	8.5773	2.2671	0.0733	2.3404		9,288.6972	9,288.6972	0.5021	0.4636	9,439.3969
<b>Total</b>	<b>11.4008</b>	<b>8.4290</b>	<b>46.4058</b>	<b>0.1016</b>	<b>8.4992</b>	<b>0.2198</b>	<b>8.7190</b>	<b>2.2671</b>	<b>0.2151</b>	<b>2.4821</b>		<b>11,525.0944</b>	<b>11,525.0944</b>	<b>0.5450</b>	<b>0.5046</b>	<b>11,689.0867</b>

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.8672	2.0000e-004	0.0219	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0470	0.0470	1.2000e-004		0.0501
Energy	0.2050	1.8636	1.5655	0.0112		0.1416	0.1416		0.1416	0.1416		2,236.3503	2,236.3503	0.0429	0.0410	2,249.6398
Mobile	5.2385	6.5652	44.8185	0.0904	8.4992	0.0781	8.5773	2.2671	0.0733	2.3404		9,288.6972	9,288.6972	0.5021	0.4636	9,439.3969
<b>Total</b>	<b>10.3107</b>	<b>8.4290</b>	<b>46.4058</b>	<b>0.1016</b>	<b>8.4992</b>	<b>0.2198</b>	<b>8.7190</b>	<b>2.2671</b>	<b>0.2151</b>	<b>2.4821</b>		<b>11,525.0944</b>	<b>11,525.0944</b>	<b>0.5450</b>	<b>0.5046</b>	<b>11,689.0867</b>

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	9.56	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

### 3.0 Construction Detail

#### Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2023	12/30/2022	5	0	
2	Site Preparation	Site Preparation	1/28/2023	3/10/2023	5	30	
3	Grading	Grading	2/11/2023	3/24/2023	5	30	
4	Building Construction	Building Construction	3/11/2023	10/6/2023	5	150	
5	Paving	Paving	1/27/2024	3/8/2024	5	30	
6	Architectural Coating	Architectural Coating	2/24/2024	4/5/2024	5	30	

Acres of Grading (Site Preparation Phase): 6.05

Acres of Grading (Grading Phase): 6.05

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 321,912; Non-Residential Outdoor: 107,304; Striped Parking Area: 0  
(Architectural Coating – sqft)

#### OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Demolition	Concrete/Industrial Saws	0	0.00	0	0.00
Building Construction	Cranes	1	7.00	231	0.29
Demolition	Excavators	0	0.00	0	0.00
Grading	Excavators	1	8.00	158	0.38

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Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Grading	Graders	1	8.00	187	0.41
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Demolition	Rubber Tired Dozers	0	0.00	0	0.00
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Grading	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	0	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	90.00	35.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	18.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**3.3 Site Preparation - 2023**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.2801	0.0000	18.2801	9.9538	0.0000	9.9538			0.0000			0.0000
Off-Road	2.6595	27.5242	18.2443	0.0381		1.2660	1.2660		1.1647	1.1647		3,687,308.1	3,687,308.1	1.1926		3,717,121.9
<b>Total</b>	<b>2.6595</b>	<b>27.5242</b>	<b>18.2443</b>	<b>0.0381</b>	<b>18.2801</b>	<b>1.2660</b>	<b>19.5462</b>	<b>9.9538</b>	<b>1.1647</b>	<b>11.1185</b>		<b>3,687,308.1</b>	<b>3,687,308.1</b>	<b>1.1926</b>		<b>3,717,121.9</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0658	0.0361	0.5313	1.3500e-003	0.1479	7.4000e-004	0.1486	0.0392	6.8000e-004	0.0399		138.1447	138.1447	3.8800e-003	3.6200e-003	139.3205
<b>Total</b>	<b>0.0658</b>	<b>0.0361</b>	<b>0.5313</b>	<b>1.3500e-003</b>	<b>0.1479</b>	<b>7.4000e-004</b>	<b>0.1486</b>	<b>0.0392</b>	<b>6.8000e-004</b>	<b>0.0399</b>		<b>138.1447</b>	<b>138.1447</b>	<b>3.8800e-003</b>	<b>3.6200e-003</b>	<b>139.3205</b>



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**3.3 Site Preparation - 2023**

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.2801	0.0000	18.2801	9.9538	0.0000	9.9538			0.0000			0.0000
Off-Road	2.6595	27.5242	18.2443	0.0381		1.2660	1.2660		1.1647	1.1647	0.0000	3,687.3081	3,687.3081	1.1926		3,717.1219
<b>Total</b>	<b>2.6595</b>	<b>27.5242</b>	<b>18.2443</b>	<b>0.0381</b>	<b>18.2801</b>	<b>1.2660</b>	<b>19.5462</b>	<b>9.9538</b>	<b>1.1647</b>	<b>11.1185</b>	<b>0.0000</b>	<b>3,687.3081</b>	<b>3,687.3081</b>	<b>1.1926</b>		<b>3,717.1219</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0658	0.0361	0.5313	1.3500e-003	0.1479	7.4000e-004	0.1486	0.0392	6.8000e-004	0.0399		138.1447	138.1447	3.8800e-003	3.6200e-003	139.3205
<b>Total</b>	<b>0.0658</b>	<b>0.0361</b>	<b>0.5313</b>	<b>1.3500e-003</b>	<b>0.1479</b>	<b>7.4000e-004</b>	<b>0.1486</b>	<b>0.0392</b>	<b>6.8000e-004</b>	<b>0.0399</b>		<b>138.1447</b>	<b>138.1447</b>	<b>3.8800e-003</b>	<b>3.6200e-003</b>	<b>139.3205</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**3.4 Grading - 2023**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.2360	0.0000	6.2360	3.3333	0.0000	3.3333			0.0000			0.0000
Off-Road	1.7109	17.9359	14.7507	0.0297		0.7749	0.7749		0.7129	0.7129		2,872.6910	2,872.6910	0.9291		2,895.9182
<b>Total</b>	<b>1.7109</b>	<b>17.9359</b>	<b>14.7507</b>	<b>0.0297</b>	<b>6.2360</b>	<b>0.7749</b>	<b>7.0109</b>	<b>3.3333</b>	<b>0.7129</b>	<b>4.0463</b>		<b>2,872.6910</b>	<b>2,872.6910</b>	<b>0.9291</b>		<b>2,895.9182</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0548	0.0301	0.4428	1.1200e-003	0.1232	6.1000e-004	0.1238	0.0327	5.6000e-004	0.0333		115.1206	115.1206	3.2400e-003	3.0200e-003	116.1004
<b>Total</b>	<b>0.0548</b>	<b>0.0301</b>	<b>0.4428</b>	<b>1.1200e-003</b>	<b>0.1232</b>	<b>6.1000e-004</b>	<b>0.1238</b>	<b>0.0327</b>	<b>5.6000e-004</b>	<b>0.0333</b>		<b>115.1206</b>	<b>115.1206</b>	<b>3.2400e-003</b>	<b>3.0200e-003</b>	<b>116.1004</b>

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**3.4 Grading - 2023**

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.2360	0.0000	6.2360	3.3333	0.0000	3.3333			0.0000			0.0000
Off-Road	1.7109	17.9359	14.7507	0.0297		0.7749	0.7749		0.7129	0.7129	0.0000	2,872.6910	2,872.6910	0.9291		2,895.9182
<b>Total</b>	<b>1.7109</b>	<b>17.9359</b>	<b>14.7507</b>	<b>0.0297</b>	<b>6.2360</b>	<b>0.7749</b>	<b>7.0109</b>	<b>3.3333</b>	<b>0.7129</b>	<b>4.0463</b>	<b>0.0000</b>	<b>2,872.6910</b>	<b>2,872.6910</b>	<b>0.9291</b>		<b>2,895.9182</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0548	0.0301	0.4428	1.1200e-003	0.1232	6.1000e-004	0.1238	0.0327	5.6000e-004	0.0333		115.1206	115.1206	3.2400e-003	3.0200e-003	116.1004
<b>Total</b>	<b>0.0548</b>	<b>0.0301</b>	<b>0.4428</b>	<b>1.1200e-003</b>	<b>0.1232</b>	<b>6.1000e-004</b>	<b>0.1238</b>	<b>0.0327</b>	<b>5.6000e-004</b>	<b>0.0333</b>		<b>115.1206</b>	<b>115.1206</b>	<b>3.2400e-003</b>	<b>3.0200e-003</b>	<b>116.1004</b>

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**3.5 Building Construction - 2023**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555,209.9	2,555,209.9	0.6079		2,570,406.1
<b>Total</b>	<b>1.5728</b>	<b>14.3849</b>	<b>16.2440</b>	<b>0.0269</b>		<b>0.6997</b>	<b>0.6997</b>		<b>0.6584</b>	<b>0.6584</b>		<b>2,555,209.9</b>	<b>2,555,209.9</b>	<b>0.6079</b>		<b>2,570,406.1</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0510	1.2610	0.5979	6.9100e-003	0.2374	0.0113	0.2487	0.0684	0.0108	0.0792		727.4408	727.4408	3.1400e-003	0.1014	757.7494
Worker	0.3290	0.1803	2.6567	6.7500e-003	0.7393	3.6800e-003	0.7430	0.1961	3.3900e-003	0.1995		690.7237	690.7237	0.0194	0.0181	696.6023
<b>Total</b>	<b>0.3800</b>	<b>1.4413</b>	<b>3.2546</b>	<b>0.0137</b>	<b>0.9767</b>	<b>0.0150</b>	<b>0.9917</b>	<b>0.2645</b>	<b>0.0142</b>	<b>0.2787</b>		<b>1,418,164.5</b>	<b>1,418,164.5</b>	<b>0.0226</b>	<b>0.1195</b>	<b>1,454,351.6</b>

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ADLT 054 - Mojave Desert Air Basin, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**3.5 Building Construction - 2023**

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555,209.9	2,555,209.9	0.6079		2,570,406.1
<b>Total</b>	<b>1.5728</b>	<b>14.3849</b>	<b>16.2440</b>	<b>0.0269</b>		<b>0.6997</b>	<b>0.6997</b>		<b>0.6584</b>	<b>0.6584</b>	<b>0.0000</b>	<b>2,555,209.9</b>	<b>2,555,209.9</b>	<b>0.6079</b>		<b>2,570,406.1</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0510	1.2610	0.5979	6.9100e-003	0.2374	0.0113	0.2487	0.0684	0.0108	0.0792		727.4408	727.4408	3.1400e-003	0.1014	757.7494
Worker	0.3290	0.1803	2.6567	6.7500e-003	0.7393	3.6800e-003	0.7430	0.1961	3.3900e-003	0.1995		690.7237	690.7237	0.0194	0.0181	696.6023
<b>Total</b>	<b>0.3800</b>	<b>1.4413</b>	<b>3.2546</b>	<b>0.0137</b>	<b>0.9767</b>	<b>0.0150</b>	<b>0.9917</b>	<b>0.2645</b>	<b>0.0142</b>	<b>0.2787</b>		<b>1,418,164.5</b>	<b>1,418,164.5</b>	<b>0.0226</b>	<b>0.1195</b>	<b>1,454,351.6</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**3.6 Paving - 2024**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.547 2	2,207.547 2	0.7140		2,225.396 3
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>0.9882</b>	<b>9.5246</b>	<b>14.6258</b>	<b>0.0228</b>		<b>0.4685</b>	<b>0.4685</b>		<b>0.4310</b>	<b>0.4310</b>		<b>2,207.547 2</b>	<b>2,207.547 2</b>	<b>0.7140</b>		<b>2,225.396 3</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0507	0.0266	0.4078	1.0900e-003	0.1232	5.8000e-004	0.1238	0.0327	5.3000e-004	0.0332		112.2666	112.2666	2.9100e-003	2.7900e-003	113.1713
<b>Total</b>	<b>0.0507</b>	<b>0.0266</b>	<b>0.4078</b>	<b>1.0900e-003</b>	<b>0.1232</b>	<b>5.8000e-004</b>	<b>0.1238</b>	<b>0.0327</b>	<b>5.3000e-004</b>	<b>0.0332</b>		<b>112.2666</b>	<b>112.2666</b>	<b>2.9100e-003</b>	<b>2.7900e-003</b>	<b>113.1713</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**3.6 Paving - 2024**

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.547 2	2,207.547 2	0.7140		2,225.396 3
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>0.9882</b>	<b>9.5246</b>	<b>14.6258</b>	<b>0.0228</b>		<b>0.4685</b>	<b>0.4685</b>		<b>0.4310</b>	<b>0.4310</b>	<b>0.0000</b>	<b>2,207.547 2</b>	<b>2,207.547 2</b>	<b>0.7140</b>		<b>2,225.396 3</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0507	0.0266	0.4078	1.0900e-003	0.1232	5.8000e-004	0.1238	0.0327	5.3000e-004	0.0332		112.2666	112.2666	2.9100e-003	2.7900e-003	113.1713
<b>Total</b>	<b>0.0507</b>	<b>0.0266</b>	<b>0.4078</b>	<b>1.0900e-003</b>	<b>0.1232</b>	<b>5.8000e-004</b>	<b>0.1238</b>	<b>0.0327</b>	<b>5.3000e-004</b>	<b>0.0332</b>		<b>112.2666</b>	<b>112.2666</b>	<b>2.9100e-003</b>	<b>2.7900e-003</b>	<b>113.1713</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**3.7 Architectural Coating - 2024**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	132.6277					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
<b>Total</b>	<b>132.8085</b>	<b>1.2188</b>	<b>1.8101</b>	<b>2.9700e-003</b>		<b>0.0609</b>	<b>0.0609</b>		<b>0.0609</b>	<b>0.0609</b>		<b>281.4481</b>	<b>281.4481</b>	<b>0.0159</b>		<b>281.8443</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0609	0.0320	0.4894	1.3100e-003	0.1479	7.0000e-004	0.1486	0.0392	6.4000e-004	0.0399		134.7199	134.7199	3.4900e-003	3.3500e-003	135.8056
<b>Total</b>	<b>0.0609</b>	<b>0.0320</b>	<b>0.4894</b>	<b>1.3100e-003</b>	<b>0.1479</b>	<b>7.0000e-004</b>	<b>0.1486</b>	<b>0.0392</b>	<b>6.4000e-004</b>	<b>0.0399</b>		<b>134.7199</b>	<b>134.7199</b>	<b>3.4900e-003</b>	<b>3.3500e-003</b>	<b>135.8056</b>



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**3.7 Architectural Coating - 2024**

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	132.6277					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
<b>Total</b>	<b>132.8085</b>	<b>1.2188</b>	<b>1.8101</b>	<b>2.9700e-003</b>		<b>0.0609</b>	<b>0.0609</b>		<b>0.0609</b>	<b>0.0609</b>	<b>0.0000</b>	<b>281.4481</b>	<b>281.4481</b>	<b>0.0159</b>		<b>281.8443</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0609	0.0320	0.4894	1.3100e-003	0.1479	7.0000e-004	0.1486	0.0392	6.4000e-004	0.0399		134.7199	134.7199	3.4900e-003	3.3500e-003	135.8056
<b>Total</b>	<b>0.0609</b>	<b>0.0320</b>	<b>0.4894</b>	<b>1.3100e-003</b>	<b>0.1479</b>	<b>7.0000e-004</b>	<b>0.1486</b>	<b>0.0392</b>	<b>6.4000e-004</b>	<b>0.0399</b>		<b>134.7199</b>	<b>134.7199</b>	<b>3.4900e-003</b>	<b>3.3500e-003</b>	<b>135.8056</b>

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

#### 4.0 Operational Detail - Mobile

#### 4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	5.2385	6.5652	44.8185	0.0904	8.4992	0.0781	8.5773	2.2671	0.0733	2.3404		9,288,697 2	9,288,697 2	0.5021	0.4636	9,439,396 9
Unmitigated	5.2385	6.5652	44.8185	0.0904	8.4992	0.0781	8.5773	2.2671	0.0733	2.3404		9,288,697 2	9,288,697 2	0.5021	0.4636	9,439,396 9

#### 4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Manufacturing	843.41	1,377.78	1092.35	2,789,045	2,789,045
Total	843.41	1,377.78	1,092.35	2,789,045	2,789,045

#### 4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Manufacturing	9.50	7.30	7.30	59.00	28.00	13.00	92	5	3

#### 4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Manufacturing	0.527784	0.055794	0.172538	0.138404	0.030772	0.007929	0.006926	0.022859	0.000522	0.000195	0.029025	0.001167	0.006083

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## 5.0 Energy Detail

Historical Energy Use: N

## 5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.2050	1.8636	1.5655	0.0112		0.1416	0.1416		0.1416	0.1416		2,236.3503	2,236.3503	0.0429	0.0410	2,249.6398
NaturalGas Unmitigated	0.2050	1.8636	1.5655	0.0112		0.1416	0.1416		0.1416	0.1416		2,236.3503	2,236.3503	0.0429	0.0410	2,249.6398

## 5.2 Energy by Land Use - NaturalGas

### Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Manufacturing	19009	0.2050	1.8636	1.5655	0.0112		0.1416	0.1416		0.1416	0.1416		2,236.3503	2,236.3503	0.0429	0.0410	2,249.6398
Total		0.2050	1.8636	1.5655	0.0112		0.1416	0.1416		0.1416	0.1416		2,236.3503	2,236.3503	0.0429	0.0410	2,249.6398

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## 5.2 Energy by Land Use - Natural Gas

### Mitigated

	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Manufacturing	19,009	0.2050	1.8636	1.5655	0.0112		0.1416	0.1416		0.1416	0.1416		2,236.3503	2,236.3503	0.0429	0.0410	2,249.6398
Total		0.2050	1.8636	1.5655	0.0112		0.1416	0.1416		0.1416	0.1416		2,236.3503	2,236.3503	0.0429	0.0410	2,249.6398

## 6.0 Area Detail

### 6.1 Mitigation Measures Area

Use Low VOC Paint - Non-Residential Interior

Use Low VOC Paint - Non-Residential Exterior

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	4.8672	2.0000e-004	0.0219	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0470	0.0470	1.2000e-004		0.0501
Unmitigated	5.9573	2.0000e-004	0.0219	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0470	0.0470	1.2000e-004		0.0501

**6.2 Area by SubCategory**

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.3626					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	4.5926					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.0300e-003	2.0000e-004	0.0219	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0470	0.0470	1.2000e-004		0.0501
<b>Total</b>	<b>5.9573</b>	<b>2.0000e-004</b>	<b>0.0219</b>	<b>0.0000</b>		<b>8.0000e-005</b>	<b>8.0000e-005</b>		<b>8.0000e-005</b>	<b>8.0000e-005</b>		<b>0.0470</b>	<b>0.0470</b>	<b>1.2000e-004</b>		<b>0.0501</b>

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**6.2 Area by SubCategory**

**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.2725					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	4.5926					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	2.0300e-003	2.0000e-004	0.0219	0.0000		8.0000e-005	8.0000e-005		8.0000e-005	8.0000e-005		0.0470	0.0470	1.2000e-004		0.0501
<b>Total</b>	<b>4.8672</b>	<b>2.0000e-004</b>	<b>0.0219</b>	<b>0.0000</b>		<b>8.0000e-005</b>	<b>8.0000e-005</b>		<b>8.0000e-005</b>	<b>8.0000e-005</b>		<b>0.0470</b>	<b>0.0470</b>	<b>1.2000e-004</b>		<b>0.0501</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION  
KOALA LA, LLC • APN 3210-631-012 & 013 • CUP 21-22, LDP 21-22, & TPM 20454 • CITY OF ADELANTO

CalEEMod Version: CalEEMod.2020.4.0

Page 24 of 24

Date: 3/3/2022 2:35 PM

ADLT 054 - Mojave Desert Air Basin, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

## 8.0 Waste Detail

---

### 8.1 Mitigation Measures Waste

## 9.0 Operational Offroad

---

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	-----------	-------------	-------------	-----------

## 10.0 Stationary Equipment

---

### Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	------------	-------------	-------------	-----------

### Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
----------------	--------	----------------	-----------------	---------------	-----------

### User Defined Equipment

Equipment Type	Number
----------------	--------

## 11.0 Vegetation

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## **APPENDIX B – BIOLOGICAL STUDY**

# GENERAL BIOLOGICAL RESOURCES ASSESSMENT

ADELANTO, SAN BERNARDINO COUNTY, CALIFORNIA  
APN's: 3210-631-12 & 13

*Prepared for:*

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Ryan Hunter, Environmental Scientist/Biologist  
Jessica Hensley, Biologist



Project: #2021-177 BA

November 29, 2021

**TITLE PAGE**

**Date Report Written:** November 29, 2021

**Date Field Work Completed:** November 22, 2021

**Report Title:** General Biological Resources Assessment

**Project Location:** Adelanto, California  
APN's: 3210-631-12 & 13

**Prepared for:** Blue Engineering & Consulting Inc.  
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Appendix A – Tables and Figures

## 1.0 INTRODUCTION AND SUMMARY

Biological surveys were conducted on a 6-acre parcel (approximately) located on the southwest corner of the intersection of Violet Road and Koala Road in the City of Adelanto, California (Township 6 North, Range 6 West, Section 36, USGS Adelanto, California Quadrangle, 1956) (Figures 1, 2, and 3). The project proponent is proposing to construct an industrial development in an area of Adelanto zoned for manufacturing and industrial uses (MI) (Figure 4).

As part of the environmental process, California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS) data sources were reviewed. Following the data review, surveys were performed on the site on November 22, 2021, during which the biological resources on the site and in the surrounding areas were documented by biologists from RCA Associates, Inc. As part of the surveys, the property and adjoining areas were evaluated for the presence of native habitats which may support populations of sensitive wildlife species. The property was also evaluated for the presence of sensitive habitats including wetlands, vernal pools, riparian habitats, and jurisdictional areas.

Habitat assessments were also conducted for the desert tortoise, burrowing owl, and Mohave ground squirrel. Based on data from USFWS, CDFW, and a search of the California Natural Diversity Database (CNDDB, 2021). Scientific nomenclature for this report is based on the following references: Hickman (1993), Munz (1974), Stebbins (2003), Sibley (2000) and Whitaker (1980).

## 2.0 EXISTING CONDITIONS

The property is approximately 6-acre in size and is located on the southwest corner of the intersection of Koala Road and Violet Road in the City of Adelanto, California (Township 6 North, Range 6 West, Section 36, USGS Adelanto, California Quadrangle, 1956) (Figures 1, 2, and 3). The property is bordered by vacant land to the north, west, and south with an existing industrial complex to the east beyond Koala Road.

The site is approximately 895 meters above sea level and relatively flat with no slope, and supports a moderately disturbed desert scrub habitat common in the region. The property consists of Helendale Bryman Loamy sand and Cajon sand with a 2 to 5 and 0 to 2 percent slope. Both have well drainage, with a moderate available water capacity, and no frequency of flooding. The vegetation community on site is creosote bush scrub habitat encompassing mainly native plants and some non-native grasses. The site is dominated by creosote bush (*Larrea tridentata*), Nevada jointfir (*Ephedra nevadensis*), kelch grass (*Schismus barbatus*), white bursage (*Ambrosia dumosa*), and Asian mustard (*Brassica tournefortii*). Section 5.0 provides a more detailed discussion of the various plant species observed during the surveys.

The site supports a variety of wildlife, with many of them being birds. One mammal was observed on site, the antelope ground squirrel (*Ammospermophilus leucurus*). Other mammals that are expected to occur include desert cottontails (*Sylvilagus audubonii*), California ground squirrel (*Otospermophilus beecheyi*), black-tailed jackrabbit (*Lepus californicus*), and coyote (*Canis latrans*).

Birds observed included ravens (*Corvus corax*), white-crowned sparrow (*Zonotrichia leucophrys*), rock pigeon (*Columba livia*), and black throated sparrow (*Amphispiza bilineata*). Section 5.0 provides a more detailed discussion of the various species observed during the surveys.

One reptile was observed during the survey, the common side-blotched lizard (*Uta stansburiana*). Other reptiles that may occur on the site include desert spiny lizard (*Sceloporus magister*), long nose leopard lizard (*Gambelia wislizenii*), and western whiptail lizard (*Cnemidophorus tigris*). Table 2 provides a compendium of wildlife species.

In addition, no sensitive habitats (e.g., sensitive species critical habitats, etc.) have been documented in the immediate area according to the CNDDB (2021) and none were observed during the field investigations.

### 3.0 METHODOLOGIES

General biological surveys were conducted on November 22, 2021, during which biologists from RCA Associates, Inc. initially walked meandering transects throughout the property. During the surveys, data was collected on the plant and animal species present on the site. All plants and animals detected during the surveys were recorded and are provided in Tables 1 & 2 (Appendix A). The property was also evaluated for the presence of habitats which might support sensitive species. Scientific nomenclature for this report is based on the following references: Hickman (1993), Munz (1974), Stebbins (2003), Sibley (2000) and Whitaker (1980). Following completion of the initial reconnaissance survey, habitat assessments were conducted for the desert tortoise and burrowing owl, and Mohave ground squirrel. Weather conditions consisted of wind speeds of 0 to 5 mph, temperatures in the high 70's to low 80's (°F) (AM) with clear skies, 15% cloud cover. The applicable methodologies are summarized below.

**General Plant and Animal Surveys:** Meandering transects were walked on the site and in surrounding areas (i.e., the zone of influence) where accessible at a pace that allowed for careful documentation of the plant and animal species present on the site. All plants observed were identified in the field and wildlife was identified through visual observations and/or by vocalizations. Habitat assessments were conducted for the desert tortoise, burrowing owl, and Mohave ground squirrel. Tables 1 and 2 (Appendix A) provides a comprehensive compendium of the various plant and animal species observed during the field investigations.



#### 4.0 LITERATURE SEARCH

As part of the environmental process, a search of the California Natural Diversity Database (CNDDB) search was performed. Based on this review, it was determined that five special status species have been documented within the Adelanto quad of the property. The following tables provide data on each special status species which has been documented in the area.

**Table 4-1: Federal and State Listed Species and State Species of Special Concern.**

E = Endangered; T = Threatened; SSC = Species of special concern; CNPS = California Native Plant Society; CNDDB = California Natural Diversity Data Base

NAME	STATUS	HABITAT REQUIREMENTS	PRESENCE/ ABSENCE ON PROPERTY
<b>Wildlife Species</b>			
<b>Within Adelanto Quadrangle</b>			
Desert tortoise ( <i>Gopherus agassizii</i> )	Federal: Threatened State: Threatened	Desert scrub	The site is located within the known distribution of the species. An evaluation of the area and property was conducted and no tortoises or suitable habitat was observed.
Burrowing owl ( <i>Athene cunicularia</i> )	Federal: None State: None CDFW: SSC	Grasslands and desert habitats	The site does support suitable habitat for the species; however, no owls or owl sign were observed during field surveys.
Mohave ground squirrel ( <i>Xerospermophilus mohavensis</i> )	Federal: None State: Threatened	Desert scrub	The site supports somewhat suitable habitat for the species. Species has not been identified in the area; therefore, species is not likely to inhabit the site.
Swainson's Hawk ( <i>Buteo swainsoni</i> )	Federal: None State: Threatened	Open grasslands	Site does not support suitable habitat for the species; and no Swainson's hawks were observed during the field survey.
Le Conte's thrasher ( <i>Toxostoma lecontei</i> )	Federal: None State: None CDFW: SSC	Desert scrub	Site does not support suitable habitat for the species; and no thrashers were observed during the field survey.

## 5.0 RESULTS

### 5.1 General Biological Resources

The site supports a slightly disturbed desert scrub plant community which sparsely covers the property (Figure 3). Species present on the site included kelch grass (*Schismus barbatus*), creosote bush (*Larrea tridentata*), Asian mustard (*Brassica tournefortii*), Western Joshua Tree (*Yucca brevifolia*), Nevada jointfir (*Ephedra nevadensis*), rubber rabbitbrush (*Ericameria nauseosa*), and fiddleneck (*Amsinckia tessellata*). Table 1 provides a compendium of all plants occurring on the site and/or in the immediate surrounding area.

Birds observed included ravens (*Corvus corax*), white-crowned sparrow (*Zonotrichia leucophrys*), rock pigeon (*Columba livia*), and black throated sparrow (*Amphispiza bilineata*). One reptile was observed on the property being the common side-blotched lizard (*Uta stansburiana*). One mammal was observed on site, the Antelope ground squirrels (*Ammospermophilus leucurus*), although California ground squirrel (*Otospermophilus beecheyi*), black-tailed jackrabbit (*Lepus californicus*), desert cottontails (*Sylvilagus audubonii*) and Merriam's kangaroo rats (*Dipodomys merriami*) may also occur on the site given their wide-spread distribution in the region. Tables 1 and 2 (Appendix A) provides a compendium of the various plant and animal species identified during the field investigations and those common to the area. No distinct wildlife corridors were identified on the site or in the immediate area.

No sensitive habitats (e.g., wetlands, vernal pools, critical habitats for sensitive species, etc.) were observed on the site during the field investigations.

The following are the listed and special status species that have the ability to occur on the project site. It is not a comprehensive list of all the species in the quad. This information has been taken from the California Natural Diversity Database and is using the most current version.

### 5.2 Federal and State Listed Species

**Desert Tortoise:** The site is located within the documented tortoise, a state and federal threatened species, habitat according to CNDDB (2021). The property supports very marginal habitat for the desert tortoise based on the location of the site in a semi-developed area of Adelanto. No tortoises

were observed anywhere within the property boundaries during the November 22, 2021 surveys. The species is not expected to move onto the site in the near future based on the absence of any sign, absence of any recent observations in the immediate area, and the presence of busy roadways and developments in the immediate area which may act as barriers to migration of tortoises. The protocol survey results are valid for one year as per CDFW and USFWS requirements.

**Mohave Ground Squirrel:** The Mohave ground squirrel is a California state threatened species that have a short, flat, furred, white, underside tail, uniformly brown (with no spots or stripes). They inhabit open desert scrub, alkali desert scrub, and annual grasslands on sandy to gravelly surfaces in the Mojave Desert. Occupiable burrows were found on the site, but no Mohave ground squirrels were detected. It is the opinion of RCA Associates, Inc. that the habitat is not prime Mohave ground squirrel habitat and is very unlikely to support populations of the species based on the following criteria, that there have been two recent sightings, within 20 years, of the species in the Adelanto quadrangle.

**Swainson's Hawk:** The site is located within documented Swainson's hawk habitat, a state threatened raptor, according to CNDDDB (2021). No hawks were seen on the property during the survey, and no suitable habitat was observed due to previous grading of the site. Swainson's hawks occupy grasslands and breed in trees that are the only ones seen for miles. Swainson's hawks are not expected to occur on the site due to lack of habitat and prime vegetation.

### **5.3 Wildlife Species of Special Concern**

**Burrowing Owl:** The site is located within documented burrowing owl habitat according to CNDDDB (2021). No owls were seen on the property during the survey, and minimal suitable habitat was observed. Burrowing owls are not expected to occur on the site due to lack of suitable vegetation and burrows.

**Le Conte's thrasher:** Le Conte's thrashers have not been recently observed in the area according to CNDDDB (2021). Thrashers are not expected to occur on the site due to lack of critical vegetation used by the species, such as saltbush and catclaw acacia. Thrashers may be very infrequent in the area given the low population levels in the region as well as the lack of any recent sightings according to the CNDDDB.

#### **5.4 Jurisdictional Waters and Riparian Habitat**

No riparian vegetation (e.g., cottonwoods, willows, etc.) exist on the site or in the adjacent habitats. A potential jurisdictional channel was notated during the field surveys on the western border of the site, which may require a comprehensive jurisdictional delineation to be performed at a future date.

#### **5.5 Protected Plants**

As of September 22, 2020, the California Department of Fish and Wildlife temporarily listed the western Joshua tree (*Yucca brevifolia*) as an endangered species for one year until a final decision is made in 2021. Due to the presence of Joshua trees on the site, a “Protected Plant Plan” will be required at a future date, and any attempt to remove a Joshua tree from its current position will require an Incidental Take Permit (ITP).

## **6.0 IMPACTS AND MITIGATION MEASURES**

### **6.1 General Biological Resources**

Future development of the site will have minimal impact on the general biological resources present on the site, and most, if not all, of the vegetation will likely be removed during future construction activities. Wildlife will also be impacted by development activities and those species with limited mobility (i.e., small mammals and reptiles) will experience increases in mortality during the construction phase. However, more mobile species (i.e., birds, large mammals) will be displaced into adjacent areas and will likely experience minimal impacts. Therefore, loss of about 6-acres of desert vegetation is not expected to have a significant cumulative impact on the overall biological resources in the region given the presence of similar habitat throughout the surrounding desert region. No sensitive habitats (e.g., wetlands, vernal pools, critical habitats for sensitive species, etc.) were observed on the site during the field investigations.

### **6.2 Federal and State Listed and Species of Special Concern**

No federal or State-listed wildlife species were observed on the site during the field investigations including the Mohave ground squirrel and desert tortoise. In addition, there are no documented observations of these species either on the site or in the immediate area. The site is not expected to support populations of the desert tortoise based on the absence of suitable habitat.

As per CDFW protocol, the burrowing owl survey results are valid for only 30 days; therefore, CDFW may require a 30-day pre-construction survey be performed prior to any clearing/grading activities to determine if owls have moved on to the site since the November 22, 2021, surveys.

Joshua trees were the only listed plant species observed on site during the November 2021 field investigations. As per CDFW protocol, additional surveys may need to be performed as stated in section 5.5.



## 7.0 CONCLUSIONS AND RECOMMENDATIONS

Future development activities are expected to grade the property and remove the vegetation from the 6-acre parcel; however, cumulative impacts to the general biological resources (plants and animals) in the surrounding area are expected to be negligible. This assumption is based on the habitat containing scarce vegetation of non-native species. In addition, future development activities are not expected to have any impact on any State or Federal listed or State special status plant or animal species. As discussed above, the site does not support any desert tortoises. In addition, burrowing owls do not inhabit the site and are not expected to be impacted given the absence of any suitable burrows. The following mitigation measures are recommended:

1. Pre-construction surveys for burrowing owls, desert tortoise, and nesting birds protected under the Migratory Bird Treaty Act and Section 3503 of the California Fish and Wildlife Code shall be conducted prior to the commencement of Project-related ground disturbance.
  - a. Appropriate survey methods and timeframes shall be established, to ensure that chances of detecting the target species are maximized. In the event that listed species, such as the desert tortoise, are encountered, authorization from the USFWS and CDFW must be obtained. If nesting birds are detected, avoidance measures shall be implemented to ensure that nests are not disturbed until after young have fledged.
2. A Protected Plant Plan shall be developed and shall identify methods, locations, and criteria for transplanting those trees that would be removed during Project construction.
  - a. As required by the San Bernardino County Development Code, Joshua trees proposed for removal shall be transplanted or stockpiled for future transplanting wherever possible once an ITP has been granted by the CDFW.

If any sensitive species are observed on the property during future activities, CDFW and USFWS (as applicable) should be contacted to discuss specific mitigation measures which may be required for the individual species. CDFW and USFWS are the only agencies which can grant authorization for the “take” of any sensitive species and can approve the implementation of any applicable mitigation measures

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**CERTIFICATION**

I hereby certify that the statements furnished above and in the attached exhibits, presents the data and information required for this biological evaluation, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief. Fieldwork conducted for this assessment was performed by Ryan Hunter and Jessica Hensley. I certify that I have not signed a non-disclosure or consultant confidentiality agreement with the project applicant or applicant's representative and that I have no financial interest in the project.

Date: 11/29/2021 Signed: *Ryan Hunter*  
*Jessica Hensley*

Field Work Performed By: Ryan Hunter  
Environmental Scientist/Biologist

Field Work Performed By: Jessica Hensley  
Wildlife Biologist

**Appendix A**  
**Tables and Figures**

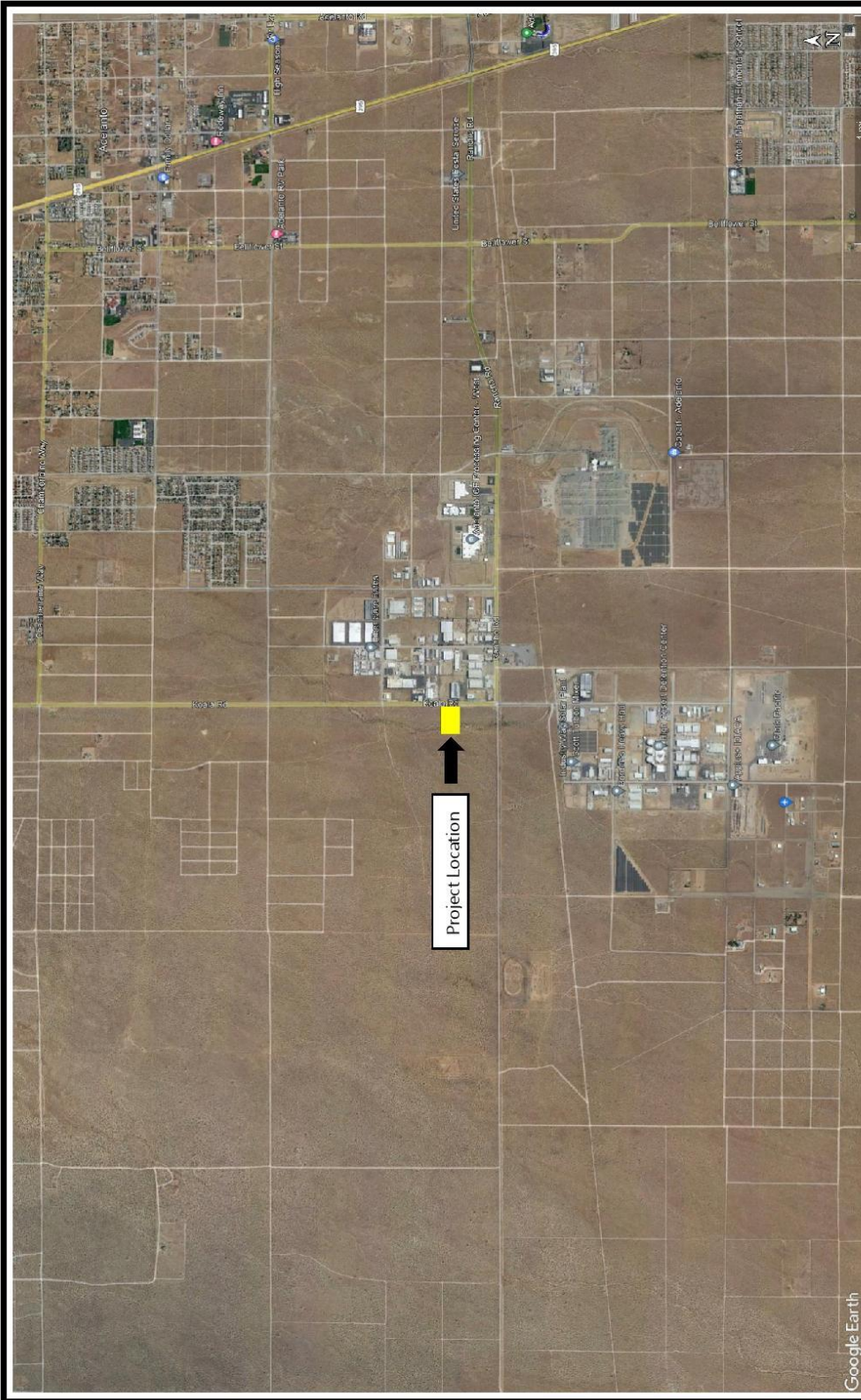


Figure 1: Regional Exhibit

**RCA**  
 ASSOCIATES, INC.  
 Source: Google Earth







CENTER OF SITE LOOKING NORTH

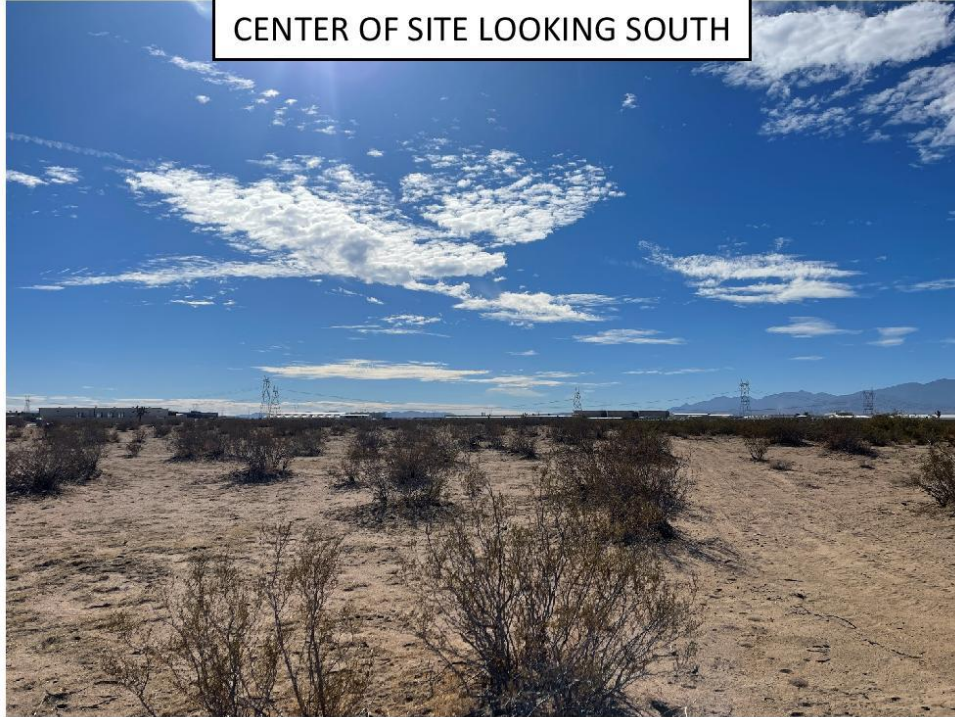


CENTER OF SITE LOOKING EAST



FIGURE 3: PHOTOGRAPHS OF SITE

CENTER OF SITE LOOKING SOUTH



CENTER OF SITE LOOKING WEST



FIGURE 3, cont: PHOTOGRAPHS OF SITE





**Table 1 - Plants observed on the site and known to occur in the immediate surrounding area.**

Common Name	Scientific Name	Location
Asian mustard	<i>Brassica tournefortii</i>	On Site
Creosote bush	<i>Larrea tridentata</i>	“
Nevada jointfir	<i>Ephedra nevadensis</i>	“
Tumbleweed	<i>Kali tragus ssp. tragus</i>	“
Kelch Grass	<i>Schismus barbatus</i>	“
Desert woollystar	<i>Eriastrum eremicum</i>	“
Joshua tree	<i>Yucca brevifolia</i>	“
Western tansymustard	<i>Descurainia pinnata</i>	“
Cheatgrass	<i>Bromus tectorum</i>	“
Fiddleneck	<i>Ansickia tessellata</i>	“
White bursage	<i>Ambrosia dumosa</i>	“
Flatspine bur ragweed	<i>Ambrosia acanthicarpa</i>	“
Burrobrush	<i>Ambrosia salsola</i>	“
Water jacket	<i>Lycium andersonii</i>	“
Winterfat	<i>Kraschenimikovia ceratoides subsp. lanata</i>	“

Note: The above list is not intended to be a comprehensive list of every plant which may occur on the site or in the zone of influence.



**Table 2 - Wildlife observed on the site during the field investigations.**

Common Name	Scientific Name	Location
Common raven	<i>Corvus corax</i>	On-site and in the surrounding area.
House sparrow	<i>Passer domesticus</i>	“
Black throated sparrow	<i>Amphispiza bilineata</i>	“
White crowned sparrow	<i>Zonotrichia leucophrys</i>	“
Anna’s hummingbird	<i>Calypte anna</i>	“
Rock pigeon	<i>Columba livia</i>	“
House finch	<i>Haemorhous mexicanus</i>	“
Mourning dove	<i>Zenaida macroura</i>	“
Antelope ground squirrel	<i>Ammospermophilus leucurus</i>	“
Common side-blotched lizard	<i>Uta stansburiana</i>	“
Long nose leopard lizard	<i>Gambelia wislizenii</i>	“
Coyote	<i>Canis latrans</i>	“

Note: The above Table is not a comprehensive list of every animal species which may occur in the area, but is a list of those common species which were identified on the site or which have been observed in the region by biologists from RCA Associates, Inc.

## **REGULATORY CONTEXT**

The following provides a summary of federal and state regulatory jurisdiction over biological and wetland resources. Although most of these regulations do not directly apply to the site, given the general lack of sensitive resources, they provide important background information.

### **Federal Endangered Species Act**

The USFWS has jurisdiction over federally listed threatened and endangered plant and animal species. The federal Endangered Species Act (ESA) and its implementing regulations prohibit the take of any fish or wildlife species that is federally listed as threatened or endangered without prior approval pursuant to either Section 7 or Section 10 of the ESA. ESA defines “take” as “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” Federal regulation 50CFR17.3 defines the term “harass” as an intentional or negligent act that creates the likelihood of injuring wildlife by annoying it to such an extent as to significantly disrupt normal behavior patterns such as breeding, feeding, or sheltering (50CFR17.3). Furthermore, federal regulation 50CFR17.3 defines “harm” as an act that either kills or injures a listed species. By definition, “harm” includes habitat modification or degradation that actually kills or injures a listed species by significantly impairing essential behavior patterns such as breeding, spawning, rearing, migrating, feeding, or sheltering (50CFR217.12).

Section 10(a) of the ESA establishes a process for obtaining an incidental take permit that authorizes nonfederal entities to incidentally take federally listed wildlife or fish. Incidental take is defined by ESA as take that is “incidental to, and not the purpose of, the carrying out of another wise lawful activity.” Preparation of a habitat conservation plan, generally referred to as an HCP, is required for all Section 10(a) permit applications. The USFWS and National Oceanic and Atmospheric Administration’s National Marine Fisheries Service (NOAA Fisheries Service) have joint authority under the ESA for administering the incidental take program. NOAA Fisheries Service has jurisdiction over anadromous fish species and USFWS has jurisdiction over all other fish and wildlife species.

Section 7 of the ESA requires all federal agencies to ensure that any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of any species listed under the ESA, or result in the destruction or adverse modification of its habitat. Federal agencies are also required

to minimize impacts to all listed species resulting from their actions, including issuance or permits or funding. Section 7 requires consideration of the indirect effects of a project, effects on federally listed plants, and effects on critical habitat (ESA requires that the USFWS identify critical habitat to the maximum extent that it is prudent and determinable when a species is listed as threatened or endangered). This consultation results in a Biological Opinion prepared by the USFWS stating whether implementation of the HCP will result in jeopardy to any HCP Covered Species or will adversely modify critical habitat and the measures necessary to avoid or minimize effects to listed species.

Although federally listed animals are legally protected from harm no matter where they occur, Section 9 of the ESA provides protection for endangered plants by prohibiting the malicious destruction on federal land and other “take” that violates State law. Protection for plants not living on federal lands is provided by the California Endangered Species Act.

#### **California Endangered Species Act**

CDFW has jurisdiction over species listed as threatened or endangered under Section 2080 of the California Fish and Wildlife Code. Section 2080 prohibits the take of a species listed by CDFW as threatened or endangered. The state definition of take is similar to the federal definition, except that Section 2080 does not prohibit indirect harm to listed species by way of habitat modification. To qualify as take under the state ESA, an action must have direct, demonstrable detrimental effect on individuals of the species. Impacts on habitat that may ultimately result in effects on individuals are not considered take under the state ESA but can be considered take under the federal ESA.

Proponents of a project affecting a state-listed species must consult with CDFW and enter into a management agreement and take permit under Section 2081. The state ESA consultation process is similar to the federal process. California ESA does not require preparation of a state biological assessment; the federal biological assessment and the CEQA analysis or any other relevant information can provide the basis for consultation. California ESA requires that CDFW coordinate consultation for joint federally listed and state-listed species to the extent possible; generally, the state opinion for the listed species is brief and references provisions under the federal opinion.

**Clean Water Act, Section 404**

The COE and the U.S. Environmental Protection Agency regulate the placement of dredged or fill material into “Waters of the United States” under Section 404 of the Clean Water Act. Waters of the United States include lakes, rivers, streams, and their tributaries, and wetlands. Wetlands are defined for regulatory purposes as “areas inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions” (33 Code of Federal Regulations [CFR] 328.3, 40 CFR 230.3).

The COE may issue either individual permits on a case-by-case basis or general permits on a program level. General permits are pre-authorized and are issued to cover similar activities that are expected to cause only minimal adverse environmental effects. Nationwide permits (NWP’s) are general permits issued to cover particular fill activities. All NWP’s have general conditions that must be met for the permits to apply to a particular project, as well as specific conditions that apply to each NWP.

**Clean Water Act, Section 401**

Section 401 of the Clean Water Act requires water quality certification and authorization of placement of dredged or fill material in wetlands and Other Waters of the United States. In accordance with Section 401 of the Clean Water Act, criteria for allowable discharges into surface waters have been developed by the State Water Resources Control Board, Division of Water Quality. As such, proponents of any new project which may impair water quality as a result of the project are required to create a post construction stormwater management plan to ensure offsite water quality is not degraded. The resulting requirements are used as criteria in granting National Pollution Discharge Elimination System (NPDES) permits or waivers, which are obtained through the Central Valley Regional Water Quality Control Board (RWQCB). Any activity or facility that will discharge waste (such as soils from construction) into surface waters, or from which waste may be discharged, must obtain an NPDES permit or waiver from the RWQCB. The RWQCB evaluates an NPDES permit application to determine whether the proposed discharge is consistent with the adopted water quality objectives of the basin plan.

**California Fish and Wildlife Code, Sections 1600-1616**

Under the California Fish and Wildlife Code, Sections 1600-1616 CDFW regulates projects that divert, obstruct, or change the natural flow or bed, channel, or bank of any river, stream, or lake. Proponents of such projects must notify CDFW and enter into a streambed alteration agreement with them.

Section 1602 of the California Fish and Wildlife Code requires a state or local government agency, public utility, or private entity to notify CDFW before it begins a construction project that will: (1) divert, obstruct, or change the natural flow or the bed, bank, channel, or bank of any river, stream, or lake; (2) use materials from a streambed; or (3) result in the disposal or deposition of debris, waste, or other material containing crumbled, flaked, or ground pavement where it can pass into any river, stream, or lake. Once the notification is filed and determined to be complete, CDFW issues a streambed alteration agreement that contains conditions for construction and operations of the proposed project.

**California Fish and Wildlife Code, Section 3503.5**

Under the California Fish and Wildlife Code, Section 3503.5, it is unlawful to take, possess, or destroy any birds in the order Falconiformes (hawks, eagles, and falcons) or Strigiformes (owls). Take would include the disturbance of an active nest resulting in the abandonment or loss of young.

**Migratory Bird Treaty Act**

The federal Migratory Bird Treaty Act (MBTA) prohibits the taking, hunting, killing, selling, purchasing, etc. of migratory birds, parts of migratory birds, or their eggs and nests. As used in the MBTA, the term “take” is defined as “to pursue, hunt, shoot, capture, collect, kill, or attempt to pursue, hunt, shoot, capture, collect, or kill, unless the context otherwise requires.” Most bird species native to North America are covered by this act.

**Sensitive Natural Communities**

The California Office of Planning and Research and the Office of Permit Assistance (1986) define project effects that substantially diminish habitat for fish, wildlife, or plants, or that disrupt or divide the physical arrangement of an established community as significant impacts under CEQA.

This definition applies to certain natural communities because of their scarcity and ecological values and because the remaining occurrences are vulnerable to elimination. For this study, the term “sensitive natural community” includes those communities that, if eliminated or substantially degraded, would sustain a significant adverse impact as defined under CEQA. Sensitive natural communities are important ecologically because their degradation and destruction could threaten populations of dependent plant and wildlife species and significantly reduce the regional distribution and viability of the community. If the number and extent of sensitive natural communities continue to diminish, the status of rare, threatened, or endangered species could become more precarious, and populations of common species (i.e., not special status species) could become less viable. Loss of sensitive natural communities also can eliminate or reduce important ecosystem functions, such as water filtration by wetlands and bank stabilization by riparian woodlands for example.

#### **Protected Plants**

The California Desert Native Plant Act was passed in 1981 to protect non-listed California desert native plants from unlawful harvesting on both public and privately-owned lands. Harvest, transport, sale, or possession of specific native desert plants is prohibited unless a person has a valid permit. The following plants are under the protection of the California Desert Native Plants Act:

- Dalea spinosa (smoketree)
- All species of the genus Prosopis (mesquites)
- All species of the family Agavaceae (century plants, nolinias, yuccas)
- All species of Cactus
- Creosote Rings, ten feet in diameter or greater
- All Joshua Trees

The project would be required to comply with the County of San Bernardino Desert Native Plant Protection Ordinance. The removal of any trees listed under Section 88.01.060 would be required to comply with Section 88.01.050, which requires the project applicant to apply for a Tree or Plant Removal Permit prior to removal from the project site.

## **APPENDIX C— CULTURAL REPORT**

## **CULTURAL RESOURCES ASSESSMENT**

**Assessor Parcel Number 3210-631-14 Project**

**Adelanto, San Bernardino County, California**

Prepared for:

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Prepared by:

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Project No. VZK2101

### **National Archaeological Data Base Information:**

*Type of Study:* Intensive Survey  
*Resources Recorded:* None  
*Keywords:* Adelanto  
*USGS Quadrangle:* 7.5-minute Adelanto, California (1993)



**BCRCONSULTING LLC**

January 28, 2022



JANUARY 28, 2022

BCR CONSULTING LLC  
CULTURAL RESOURCES ASSESSMENT  
ASSESSOR PARCEL NUMBER 3210-631-14 PROJECT

## MANAGEMENT SUMMARY

BCR Consulting LLC (BCR Consulting) is under contract to Blue Engineering & Construction, Inc. to complete a Cultural Resources Assessment of Assessment Parcel Number 3210-631-14 Project (the project) located in the City of Adelanto (City), San Bernardino County, California. A cultural resources records search, intensive pedestrian field survey, Sacred Lands File search with the Native American Heritage Commission (NAHC), and paleontological overview were conducted for the project in partial fulfillment of the California Environmental Quality Act (CEQA).

The cultural resources records search revealed that ten cultural resources studies have taken place resulting in the recording of two cultural resources within one half-mile of the project site. The project site has been subject to one previous cultural resources assessment and no cultural resources have been previously recorded within its boundaries. No cultural resources (including prehistoric or historic-period archaeological sites or historic-period buildings) were identified within the project site during the field survey. Based on these results BCR Consulting recommends that no additional cultural resource work or monitoring is necessary for any earthmoving proposed within the project site. However, if previously undocumented cultural resources are identified during earthmoving activities, a qualified archaeologist should be contacted to assess the nature and significance of the find, diverting construction excavation if necessary.

Findings were negative during the Sacred Lands File search with the NAHC. The results of the Sacred Lands File search are provided in Appendix C. Since the City will initiate and carry out the required AB52 Native American Consultation, the results of the consultation are not provided in this report. However, this report may be used during the consultation process, and BCR Consulting staff is available to answer questions and address concerns as necessary.

According to CEQA Guidelines, projects subject to CEQA must determine whether the project would "directly or indirectly destroy a unique paleontological resource". The appended Paleontological Overview provided in Appendix D has recommended that:

The geologic units underlying this project are mapped entirely as alluvial silt, sand and gravel deposits dating to the Holocene epoch (Dibblee & Minch, 2008). While Holocene alluvial units are considered to be of high preservation value, material found is unlikely to be fossil material due to the relatively modern associated dates of the deposits. However, if development requires any substantial depth of disturbance, the likelihood of reaching older Holocene or Late Pleistocene alluvial sediments would increase. The Western Science Center does not have localities within the project area or within a 1 mile radius.

While the presence of any fossil material is unlikely, if excavation activity for Assessor Parcel Number 3210-631-14 Project disturbs deeper sediment dating to the earliest parts of the Holocene or Late Pleistocene periods, the material would be scientifically significant. Excavation activity associated with the development of the project area is unlikely to be paleontologically sensitive, but caution during development should be observed.

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If human remains are encountered during any proposed project activities, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC.

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## INTRODUCTION

BCR Consulting LLC (BCR Consulting) is under contract to Blue Engineering & Construction, Inc. to conduct a complete a Cultural Resources Assessment of Assessor Parcel Number 3210-631-14 Project (the project) located in the City of Adelanto (City), San Bernardino County, California. The project site is located in Section 35 of Township 6 North, Range 6 West, San Bernardino Baseline and Meridian. It is depicted on the United States Geological Survey (USGS) *Adelanto, California* (1993) 7.5-minute topographic quadrangle (Figure 1).

### Regulatory Setting

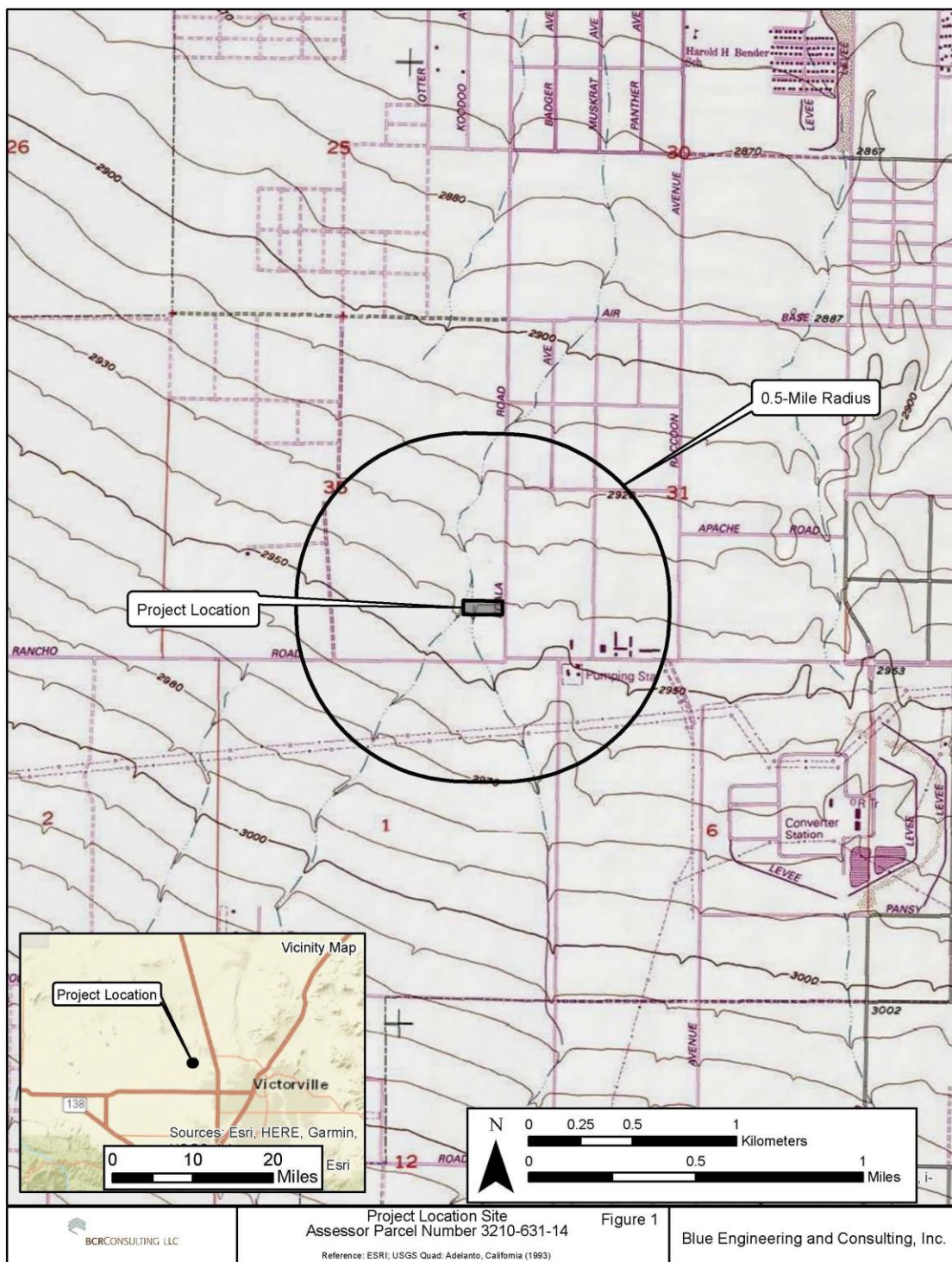
**The California Environmental Quality Act.** CEQA applies to all discretionary projects undertaken or subject to approval by the state's public agencies (California Code of Regulations 14(3), § 15002(i)). Under CEQA, "A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (Cal. Code Regs. tit. 14(3), § 15064.5(b)). State CEQA Guidelines section 15064.5(a) defines a "historical resource" as a resource that meets one or more of the following criteria:

- Listed in, or eligible for listing in, the California Register of Historical Resources (California Register)
- Listed in a local register of historical resources (as defined at Cal. Public Res. Code § 5020.1(k))
- Identified as significant in a historical resource survey meeting the requirements of § 5024.1(g) of the Cal. Public Res. Code
- Determined to be a historical resource by a project's lead agency (Cal. Code Regs. tit. 14(3), § 15064.5(a))

A historical resource consists of "Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California...Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing in the California Register of Historical Resources" (Cal. Code Regs. tit. 14(3), § 15064.5(a)(3)).

The significance of a historical resource is impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for the California Register. If an impact on a historical or archaeological resource is significant, CEQA requires feasible measures to minimize the impact (State CEQA Guidelines § 15126.4 (a)(1)). Mitigation of significant impacts must lessen or eliminate the physical impact that the project will have on the resource.

Section 5024.1 of the Cal. Public Res. Code established the California Register. Generally, a resource is considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the California Register (Cal. Code Regs. tit. 14(3), §



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15064.5(a)(3)). The eligibility criteria for the California Register are similar to those of the National Register of Historic Places (National Register), and a resource that meets one of more of the eligibility criteria of the National Register will be eligible for the California Register.

The California Register program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance, identifies historical resources for state and local planning purposes, determines eligibility for state historic preservation grant funding and affords certain protections under CEQA. Criteria for Designation:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. Associated with the lives of persons important to local, California or national history.
3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

In addition to meeting one or more of the above criteria, the California Register requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resources." (CCR 4852 [d][2]). Fifty years is normally considered sufficient time for a potential historical resource, and in order that the evaluation remain valid for a minimum of five years after the date of this report, all resources older than 45 years (i.e. resources from the "historic-period") will be evaluated for California Register listing eligibility, or CEQA significance. The California Register also requires that a resource possess integrity. This is defined as the ability for the resource to convey its significance through seven aspects: location, setting, design, materials, workmanship, feeling, and association.

**Assembly Bill 52.** California Assembly Bill 52 was approved on September 25, 2014. As stated in Section 11 of AB 52, the act applies only to projects that have a notice of preparation or a notice of negative declaration or mitigated negative declaration filed on or after July 1, 2015.

AB 52 establishes "tribal cultural resources" (TCRs) as a category of resources under CEQA. As defined under Public Resources Code Section 21074, TCRs are "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe" that are either: (1) included or determined to be eligible for inclusion in the CRHR; included in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or (2) determined by the lead agency to be significant pursuant to the criteria for inclusion in the CRHR set forth in Public Resources Code Section 5024.1(c), if supported by substantial evidence and taking into account the significance of the resource to a California Native American tribe. A "historical resource" as defined in Public Resources Code Section 21084.1, a "unique archaeological resource" as defined in



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Public Resources Code Section 21083.2(g), or a “nonunique archaeological resource” as defined in Public Resources Code Section 21083.2(h) may also be TCRs.

AB 52 further establishes a new consultation process with California Native American tribes for proposed projects in geographic areas that are traditionally and culturally affiliated with that tribe. Per Public Resources Code Section 21073, “California Native American tribe” includes federally and non-federally recognized tribes on the NAHC contact list. Subject to certain prerequisites, AB 52 requires, among other things, that a lead agency consult with the geographically affiliated tribe before the release of an environmental review document for a proposed project regarding project alternatives, recommended mitigation measures, or potential significant effects, if the tribe so requests in writing. If the tribe and the lead agency agree upon mitigation measures during their consultation, these mitigation measures must be recommended for inclusion in the environmental document (Public Resources Code Sections 21080.3.1, 21080.3.2, 21082.3, 21084.2, and 21084.3).

**Paleontological Resources.** CEQA provides guidance relative to significant impacts on paleontological resources, indicating that a project would have a significant impact on paleontological resources if it disturbs or destroys a unique paleontological resource or site, or unique geologic feature. Section 5097.5 of the California Public Resources Code specifies that any unauthorized removal of paleontological remains is a misdemeanor. Further, California Penal Code Section 622.5 sets the penalties for damage or removal of paleontological resources. CEQA documentation prepared for projects would be required to analyze paleontological resources as a condition of the CEQA process to disclose potential impacts. Please note that as of January 2018 paleontological resources are considered in the geological rather than cultural category. Therefore, paleontological resources are not summarized in the body of this report. A paleontological overview completed by professional paleontologists from the Western Science Center is provided as Appendix D.

## NATURAL SETTING

### Geology

The subject property is located in the southwestern portion of the Mojave Desert. Sediments within the subject property boundaries include unconsolidated stream-laid sand deposited in former flood plain of the Fremont Wash (Dibblee 1960). Field observations during the current study are consistent with these descriptions.

### Hydrology

The subject property elevation ranges from approximately 2,945 to 2,950 feet above mean sea level (AMSL). Sheetwashing occurs generally from south to north across the subject property, and an intermittent drainage bisects the property from south to north. To the south, the peaks of the San Bernardino Mountains rise above 10,000 feet and are often capped with snow until late spring or early summer. The area currently exhibits a relatively arid climate, with dry, hot summers and cool winters. Rainfall ranges from five to 15 inches annually (Jaeger and Smith 1971:36-37). Precipitation usually occurs in the form of winter and spring rain or snow at high elevations, with occasional warm monsoonal showers in late summer.

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## Biology

The mild climate of the late Pleistocene allowed piñon-juniper woodland to thrive throughout most of the Mojave (Van Devender et al. 1987). The vegetation and climate during this epoch attracted significant numbers of Rancho labrean fauna, including dire wolf, saber-toothed cat, short-faced bear, horse, camel, antelope, mammoth, as well as birds which included pelican, goose, duck, cormorant, and eagle (Reynolds 1988). The drier climate of the middle Holocene resulted in the local development of complementary flora and fauna, which remain largely intact to this day. Common native plants include creosote, cacti, rabbit bush, interior golden bush, cheesebush, species of sage, buckwheat at higher elevations and near drainages, Joshua tree, and various grasses. Common native animals include coyotes, cottontail and jackrabbits, rats, mice, desert tortoises, roadrunners, raptors, turkey vultures, and other bird species (see Williams et al. 2008).

## CULTURAL SETTING

### Prehistory

The prehistoric cultural setting of the Mojave Desert has been organized into many chronological frameworks (see Warren and Crabtree 1986; Bettinger and Taylor 1974; Lanning 1963; Hunt 1960; Wallace 1958, 1962, 1977; Wallace and Taylor 1978; Campbell and Campbell 1935), although there is no definitive sequence for the region. The difficulties in establishing cultural chronologies for the Mojave are a function of its enormous size and the small amount of archaeological excavations conducted there. Moreover, throughout prehistory many groups have occupied the Mojave and their territories often overlap spatially and chronologically resulting in mixed artifact deposits. Due to dry climate and capricious geological processes, these artifacts rarely become integrated in-situ. Lacking a milieu hospitable to the preservation of cultural midden, Mojave chronologies have relied upon temporally diagnostic artifacts, such as projectile points, or upon the presence/absence of other temporal indicators, such as groundstone. Such methods are instructive, but can be limited by prehistoric occupants' concurrent use of different artifact styles, or by artifact re-use or re-sharpening, as well as researchers' mistaken diagnosis, and other factors (see Flenniken 1985; Flenniken and Raymond 1986; Flenniken and Wilke 1989). Recognizing the shortcomings of comparative temporal indicators, this study synthesizes Warren and Crabtree (1986), who have drawn upon this method to produce a commonly cited and relatively comprehensive chronology.

**Paleoindian (12,000 to 10,000 BP) and Lake Mojave (10,000 to 7,000 BP) Periods.** Climatic warming characterizes the transition from the Paleoindian Period to the Lake Mojave Period. This transition also marks the end of Pleistocene Epoch and ushers in the Holocene. The Paleoindian Period has been loosely defined by isolated fluted (such as Clovis) projectile points, dated by their association with similar artifacts discovered in-situ in the Great Plains (Sutton 1996:227-228). Some fluted bifaces have been associated with fossil remains of Rancholabrean mammals approximately dated to ca. 13,300-10,800 BP near China Lake in the northern Mojave Desert. The Lake Mojave Period has been associated with cultural adaptations to moist conditions, and resource allocation pointing to more lacustrine environments than previously (Bedwell 1973; Hester 1973). Artifacts that characterize this period include stemmed points, flake and core scrapers, choppers, hammerstones, and crescentics (Warren and Crabtree 1986:184). Projectile points



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associated with the period include the Silver Lake and Lake Mojave styles. Lake Mojave sites commonly occur on shorelines of Pleistocene lakes and streams, where geological surfaces of that epoch have been identified (Basgall and Hall 1994:69).

**Pinto Period (7,000 to 4,000 BP).** The Pinto Period has been largely characterized by desiccation of the Mojave. As formerly rich lacustrine environments began to disappear, the artifact record reveals more sporadic occupation of the Mojave, indicating occupants' recession to the more hospitable fringes (Warren 1984). Pinto Period sites are rare, and are characterized by surface manifestations that usually lack significant in-situ remains. Artifacts from this era include Pinto projectile points and a flake industry similar to the Lake Mojave tool complex (Warren 1984), though use of Pinto projectile points as an index artifact for the era has been disputed (see Schroth 1994). Milling stones have also occasionally been associated with sites of this period (Warren 1984).

**Gypsum Period. (4,000 to 1,500 BP).** A temporary return to moister conditions during the Gypsum Period is postulated to have encouraged technological diversification afforded by the relative abundance of resources (Warren 1984:419-420; Warren and Crabtree 1986:189). Lacustrine environments reappear and begin to be exploited during this era (Shutler 1961, 1968). Concurrently a more diverse artifact assemblage reflects intensified reliance on plant resources. The new artifacts include milling stones, mortars, pestles, and a proliferation of Humboldt Concave Base, Gypsum Cave, Elko Eared, and Elko Corner-notched dart points (Warren 1984; Warren and Crabtree 1986). Other artifacts include leaf-shaped projectile points, rectangular-based knives, drills, large scraper planes, choppers, hammer stones, shaft straighteners, incised stone pendants, and drilled slate tubes. The bow and arrow appears around 2,000 BP, evidenced by the presence of a smaller type of projectile point, the Rose Spring point (Rogers 1939; Shutler 1961; Yohe 1992).

**Saratoga Springs Period (1,500 to 800 BP).** During the Saratoga Springs Period regional cultural diversifications of Gypsum Period developments are evident within the Mojave. Basketmaker III (Anasazi) pottery appears during this period, and has been associated with turquoise mining in the eastern Mojave Desert (Warren and Crabtree 1986:191). Influences from Patayan/Yuman assemblages are apparent in the southern Mojave, and include buff and brown wares often associated with Cottonwood and Desert Side-notched projectile points (Warren 1984:423). Obsidian becomes more commonly used throughout the Mojave and characteristic artifacts of the period include milling stones, mortars, pestles, ceramics, and ornamental and ritual objects. More structured settlement patterns are evidenced by the presence of large villages, and three types of identifiable archaeological sites (major habitation, temporary camps, and processing stations) emerge (McGuire and Hall 1988). Diversity of resource exploitation continues to expand, indicating a much more generalized, somewhat less mobile subsistence strategy.

**Shoshonean Period (800 BP to Contact).** The Shoshonean period is the first to benefit from contact-era ethnography—as well as be subject to its inherent biases. Interviews of living informants allowed anthropologists to match artifact assemblages and particular traditions with linguistic groups, and plot them geographically (see Kroeber 1925; Gifford 1918; Strong 1929). During the Shoshonean Period continued diversification of site assemblages, and reduced Anasazi influence both coincide with the expansion of Numic

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(Uto-Aztecan language family) speakers across the Great Basin, Takic (Uto-Aztecan language family) speakers into southern California, and the Hopi across the Southwest (Sutton 1996). Hunting and gathering continued to diversify, and the diagnostic arrow points include desert side-notch and cottonwood triangular. Ceramics continue to proliferate, though are more common in the southern Mojave during this period (Warren and Crabtree 1986). Trade routes have become well established across the Mojave, particularly the Mojave Trail, which transported goods and news across the desert via the Mojave River, to the west of the subject property. Trade in the western Mojave was more closely related to coastal groups than others.

### **Ethnography**

The Uto-Aztecan “Serrano” people occupied the western Mojave Desert periphery. Kroeber (1925) applied the generic term “Serrano” to four groups, each with distinct territories: the Kitanemuk, Tataviam, Vanyume, and Serrano. Only one group, in the San Bernardino Mountains and West-Central Mojave Desert, ethnically claims the term Serrano. Bean and Smith (1978) indicate that the Vanyume, an obscure Takic population, was found along the Mojave River near Apple Valley at the time of Spanish contact. The Kitanemuk lived to the north and west, while the Tataviam lived to the west. The Serrano lived mainly to the south (Bean and Smith 1978). All may have used the western Mojave area seasonally. Historical records are unclear concerning precise Serrano territory, although archaeologists have recorded evidence of a number of prehistoric sites (including some villages), particularly along the Mojave River. It is doubtful that any group, except the Vanyume, actually lived in the region for several seasons yearly.

### **History**

Historic California is divided into three periods: the Spanish/Mission Period (1769 to 1821), the Mexican/Rancho Period (1821 to 1848), and the American Period (1848 to present).

**Spanish Period.** The first European to pass through the area is thought to be a Spaniard called Father Francisco Garces. Having become familiar with the area, Garces acted as a guide to Juan Bautista de Anza, who had been commissioned to lead a group across the desert from a Spanish outpost in Arizona to set up quarters at the Mission San Gabriel in 1771 near what today is Pasadena (Beck and Haase 1974). This is the first recorded group crossing of the Mojave Desert and, according to Father Garces’ journal, they camped at the headwaters of the Mojave River, one night less than a day’s march from the mountains. Today, this is estimated to have been approximately 11 miles southeast of Victorville (Marenczuk 1962). Garces was followed by Alta California Governor Pedro Fages, who briefly explored the western Mojave region in 1772. Searching for San Diego Presidio deserters, Fages had traveled north through Riverside to San Bernardino, crossed the mountains into the Mojave, then west to the San Joaquin Valley (Beck and Haase 1974).

**Mexican Period.** In 1821, Mexico overthrew Spanish rule and the missions began to decline. By 1833, the Mexican government passed the Secularization Act, and the missions, reorganized as parish churches, lost their vast land holdings, and released their neophytes (Beattie and Beattie 1974).

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**American Period.** The American Period, 1848–Present, began with the Treaty of Guadalupe Hidalgo. In 1850, California was accepted into the Union of the United States primarily due to the population increase created by the Gold Rush of 1849. The cattle industry reached its greatest prosperity during the first years of the American Period. Mexican Period land grants had created large pastoral estates in California, and demand for beef during the Gold Rush led to a cattle boom that lasted from 1849–1855. However, beginning about 1855, the demand for beef began to decline due to imports of sheep from New Mexico and cattle from the Mississippi and Missouri Valleys. When the beef market collapsed, many California ranchers lost their ranchos through foreclosure. A series of disastrous floods in 1861–1862, followed by a significant drought diminished the economic impact of local ranching. This decline combined with ubiquitous agricultural and real estate developments of the late 19<sup>th</sup> century, set the stage for diversified economic pursuits that have continued to proliferate to this day (Beattie and Beattie 1974; Cleland 1941).

## PERSONNEL

David Brunzell, M.A., RPA acted as the Project Manager and Principal Investigator for the current study. South Central Coastal Information Center (SCCIC) staff completed the cultural resources records search. BCR Consulting Archaeological Crew Chief Nicholas Shepetuk completed the field assessment. Mr. Brunzell compiled the technical report.

## METHODS

This work was completed pursuant to the CEQA, Public Resources Code (PRC) Chapter 2.6, Section 21083.2, and California Code of Regulations (CCR) Title 14, Chapter 3, Article 5, Section 15064.5. The pedestrian cultural resources survey is intended to locate and document previously recorded or new cultural resources, including archaeological sites, features, isolates, and historic buildings, that exceed 45 years in age within defined project boundaries. The subject property was examined using 10 to 15 meter transect intervals. This study is intended to determine whether cultural resources are located within the subject property boundaries, whether any cultural resources are significant pursuant to the above-referenced regulations and standards, and to develop specific mitigation measures that will address potential impacts to existing or potential resources. Tasks pursued to achieve that end include:

- Sacred Lands File Search through the Native American Heritage Commission
- Vertebrate paleontology resources report through the Western Science Center
- Cultural resources records search to review any studies conducted and the resulting cultural resources recorded within a one-mile radius of the subject property
- Systematic pedestrian survey of the entire subject property
- Development of recommendations for any cultural resources documented within the subject property, following CEQA guidelines

## Research

Prior to fieldwork, a cultural resources records search was conducted by the SCCIC. This included a review of all prerecorded historic and prehistoric cultural resources, as well as a review of known cultural resource surveys and excavation reports generated from projects

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located within one mile of the subject property. In addition, a review was conducted of the National Register of Historic Places (National Register), the California Register, and documents and inventories from the California Office of Historic Preservation (OHP) including the lists of California Historical Landmarks, California Points of Historical Interest, Listing of National Register Properties, and the Inventory of Historic Structures.

### Field Survey

An intensive-level cultural resources field survey of the subject property was conducted on January 5, 2022. The survey was conducted by walking parallel transects spaced approximately 10-15 meters apart across 100 percent of the subject property. Digital photographs were taken at various points within the subject property boundaries, including overviews as well as detail photographs of field conditions. Hand-held Global Positioning Systems (GPS) were available for mapping purposes.

## RESULTS

### Research

The records search revealed that 10 cultural resources studies have taken place resulting in the recording of two cultural resources within one half-mile of the project site. The project site has been subject to one previous cultural resources assessment and no cultural resources have been previously recorded within its boundaries. A summary of the records search is included below, and the records search bibliography is provided in Appendix A.

**Table A. Cultural Resources Located Within One Half-Mile of the Project Site**

USGS 7.5 Min Quad	Cultural Resources Within One Half-Mile	Reports Within One Half-Mile
<i>Adelanto, California</i> (1993)	P-36-10392: Prehistoric Lithic Scatter/Historic-Period Refuse (1/4 Mile N) P-36-61240: Isolated Prehistoric Flake (1/4 Mile NE)	SB-5506, 7704, 7982*, 8161, 8162, 8163, 8164, 8165, 8166, 8167

\*Previously assessed project site.

### Field Survey

The project site exhibited approximately 90 percent surface visibility. Disturbances related to sheet washing and rilling were evident. The project site exhibits a northerly aspect and runoff flows towards intermittent drainages and eventually into the Fremont Wash, located approximately five miles to the northwest. Soils include sandy silt, and vegetation includes creosote scrub, Joshua trees, and mixed seasonal grasses. No cultural resources of any kind were identified.

## RECOMMENDATIONS

BCR Consulting did not identify any historical resources during the research and field survey. Therefore, no significant impacts related to archaeological or historical resources is anticipated and no further investigations are recommended for the proposed project unless:

- the proposed project is changed to include areas not subject to this study.
- the proposed project is changed to include the construction of additional facilities.

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- cultural materials are encountered during project activities.

Although the current study has not indicated sensitivity for cultural resources within the project boundaries, ground disturbing activities always have the potential to reveal buried deposits not observed on the surface during previous surveys. Prior to the initiation of ground-disturbing activities, field personnel should be alerted to the possibility of buried prehistoric or historic cultural deposits. In the event that field personnel encounter buried cultural materials, work in the immediate vicinity of the find should cease and a qualified archaeologist should be retained to assess the significance of the find. The qualified archaeologist shall have the authority to stop or divert construction excavation as necessary. If the qualified archaeologist finds that any cultural resources present meet eligibility requirements for listing on the California Register or the National Register, plans for the treatment, evaluation, and mitigation of impacts to the find will need to be developed. Prehistoric or historic cultural materials that may be encountered during ground-disturbing activities include:

- historic artifacts such as glass bottles and fragments, cans, nails, ceramic and pottery fragments, and other metal objects;
- historic structural or building foundations, walkways, cisterns, pipes, privies, and other structural elements;
- prehistoric flaked-stone artifacts and debitage (waste material), consisting of obsidian, basalt, and or cryptocrystalline silicates;
- groundstone artifacts, including mortars, pestles, and grinding slabs;
- dark, greasy soil that may be associated with charcoal, ash, bone, shell, flaked stone, groundstone, and fire affected rocks.

Findings were negative during the Sacred Lands File search with the NAHC. The results of the Sacred Lands File search are provided in Appendix C. Since the City will initiate and carry out the required AB52 Native American Consultation, the results of the consultation are not provided in this report. However, this report may be used during the consultation process, and BCR Consulting staff is available to answer questions and address concerns as necessary.

According to CEQA Guidelines, projects subject to CEQA must determine whether the project would “directly or indirectly destroy a unique paleontological resource”. The appended Paleontological Overview provided in Appendix D has recommended that:

The geologic units underlying this project are mapped entirely as alluvial silt, sand and gravel deposits dating to the Holocene epoch (Dibblee & Minch, 2008). While Holocene alluvial units are considered to be of high preservation value, material found is unlikely to be fossil material due to the relatively modern associated dates of the deposits. However, if development requires any substantial depth of disturbance, the likelihood of reaching older Holocene or Late Pleistocene alluvial sediments would increase. The Western Science Center does not have localities within the project area or within a 1 mile radius.

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While the presence of any fossil material is unlikely, if excavation activity for Assessor Parcel Number 3210-631-14 Project disturbs deeper sediment dating to the earliest parts of the Holocene or Late Pleistocene periods, the material would be scientifically significant. Excavation activity associated with the development of the project area is unlikely to be paleontologically sensitive, but caution during development should be observed.

If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC.

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BCR CONSULTING LLC  
CULTURAL RESOURCES ASSESSMENT  
ASSESSOR PARCEL NUMBER 3210-631-14 PROJECT

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**APPENDIX A**  
**RECORDS SEARCH BIBLIOGRAPHY**

INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION  
KOALA LA, LLC • APN 3210-631-012 & 013 • CUP 21-22, LDP 21-22, & TPM 20454 • CITY OF ADELANTO

**Report List**

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SB-05506		2006	Bonner, Wayne H. and Mamie Aislin-Kay	Cultural Resource Record Search and Site Visit Results for Cingular Telecommunications Facility Candidate ES- 0158-01 (D'cor Spas), 17129 Koala Road, Adelanto, San Bernardino County, California	Michael Brandman Associates	
SB-07704	NADB-R - 1067704	2014	Glentis, Dionisios	Archaeological Survey Report for the Southern California Edison Renewables Generation Interconnections Projects (RGIP)- GFID 5437, GFID 5440 and GFID 5442, Peterbilt 12kV and Standing Rock 12kV Distribution Circuits, Adelanto and Apple Valley, San Bernardino County, California.		
SB-07982		2013	Dietler, Sara, Elizabeth Denniston, and Steven Treffers	Cultural Resources Impact Mitigation Analysis for the Adelanto North 2035 Sustainable Community Plan, City of San Bernardino County, California	SWCA Environmental Consultants Pasadena Office	
SB-08161	Caltrans - ; Paleo -	2014	Gust, Sherri M.	COMBINED PALEONTOLOGICAL IDENTIFICATION AND EVALUATION REPORT WITHOUT SURVEY FOR THE HIGH DESERT CORRIDOR FREEWAY, LOS ANGELES AND SAN BERNARDINO COUNTIES, CALIFORNIA	Cogstone Resource Management Inc.	
SB-08162	Caltrans -	2014	Sikes, Nancy, Dustin Keeler, Molly Valaski, and Sherri M Gust	EXTENDED PHASE I TESTING REPORT P- 19-004366, P-36-000066 (CA-SBR-66), P-36- 000182 (CA-SBR-182), AND P-36-012609 (CA-SBR-12336), HIGH DESERT CORRIDOR PROJECT FROM SR 14 TO SR 18 LOS ANGELES AND SAN BERNARDINO COUNTIES, CALIFORNIA, 07-LA/ 08-SBR EA No. 116720	Cogstone Resource Management Inc.	36-000066, 36-000182, 36-012609
SB-08162A		2014	Sikes, Nancy and Sherri M Gust	Extended Phase I Testing Proposal, P-19- 004366, P-36-000066 (CA-SBR-66), P-36- 000182 (CA-SBR-182) and P-36-012609 (CA- SBR-12336), High Desert Corridor/ SR 138 Widening Project From SR 14 to SR 18, Los Angeles and San Bernardino Counties, California, 07-LA/PM 48.0 to SR 138 EA No. 116720	Cogstone Resource Management Inc.	

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**Report List**

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SB-08163		2014	Gust, Sherri, Victoria Harvey, Kim Scott, Dustin Keeler, Tadhg Kirwan, Nancy Sikes, David Earle, Karolina Chmiel, Mark C. Robinson, and Catharine M. Wood	ARCHAEOLOGICAL SURVEY REPORT FOR THE HIGH DESERT CORRIDOR, LOS ANGELES & SAN BERNARDINO COUNTIES, CALIFORNIA, 07-LA/ 08-SBD, SR-14 TO SR-18, EA 116720	Cogstone Resource Management / ICF International	36-000066, 36-000158, 36-000182, 36-003033, 36-006312, 36-010362, 36-012609, 36-021470, 36-026764
SB-08163A		2014	Earle, David D.	Historic Context and Potential National Register Eligibility of Archaeological Sites at Turner Springs, San Bernardino County	Earle and Associates	
SB-08164	Caltrans - ; Paleo -	2014	Gust, Sherri M., Tadhg Kirwan, and Lynn Furnis	EXTENDED PHASE I TESTING AND PHASE II EVALUATION PROPOSAL, HIGH DESERT CORRIDOR/ SR 138 WIDENING PROJECT FROM SR 14 TO SR 18 LOS ANGELES AND SAN BERNARDINO COUNTIES, CALIFORNIA, 07-LA/PM 48.0 to SR 138 EA No. 116720	Cogstone Resource Management Inc.	36-000066, 36-000158, 36-000182, 36-006312, 36-006317, 36-010362, 36-010960, 36-012609, 36-021470, 36-026764, 36-026768, 36-026769, 36-026772, 36-026773, 36-026832
SB-08165	Caltrans -	2015	Gust, Sherri M., Lynn Furnis, Justin Lev Tov, Ian Seharlotta, Desiree Martinez, and Caprice "Kip" Harper	PRELIMINARY HISTORIC PROPERTY TREATMENT PLAN FOR THE HIGH DESERT CORRIDOR PROJECT SR-14 TO SR-18 LOS ANGELES AND SAN BERNARDINO COUNTIES, CALIFORNIA, 07-LA/ 08-SBD EA 116720, EFIS 07-1200-0035	Cogstone Resource Management Inc.	36-000066, 36-000182, 36-006317, 36-010362, 36-012609, 36-021470, 36-026764, 36-026769, 36-026772, 36-029491
SB-08165A		2015		HDC Shell Bead Analysis	Cogstone Resource Management, Inc.	
SB-08165B		2015	Martinez, Desiree	Lithic Analysis by Desiree Martinez	Cogstone Resource Management, Inc.	
SB-08165C		2015		REFLECTANCE TRANSFORMATION IMAGERY (RTI) ANALYSIS	Cogstone Resource Management, Inc.	
SB-08165D		2015		VARIABLE PRESSURE SCANNING ELECTRON MICROSCOPY (VPSEM) ANALYSIS	Cogstone Resource Management, Inc.	
SB-08165E		2015	Riches, Mark	Geophysical Investigation for the High Desert Corridor SR-138 Widening Project in Victorville, California	GeoVision	

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**Report List**

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SB-08166	Caltrans -	2014	Sikes, Nancy	HISTORIC PROPERTY SURVEY REPORT FOR THE HIGH DESERT CORRIDOR, LOS ANGELES & SAN BERNARDINO COUNTIES, CALIFORNIA, 07-LA/ 08-SBD, SR-14 TO SR-18, EA 116720 EFIS 07-1200-0035	Cogstone Resource Management	36-000066, 36-000158, 36-000182, 36-003033, 36-004272, 36-006303, 36-006312, 36-006317, 36-006320, 36-008392, 36-010317, 36-010318, 36-010392, 36-010960, 36-012189, 36-012609, 36-012655, 36-012658, 36-021470, 36-023225, 36-026764, 36-026768, 36-026769, 36-026772, 36-026773, 36-026832, 36-027567, 36-027568, 36-027569, 36-027570, 36-027571, 36-027572, 36-027573, 36-027574, 36-061257
SB-08167	Caltrans -	2014	Furnis, C. Lynn, Victoria Harvey, Tadhg Kirwan, Christina Peterson, Sheri Gust, Andrea Galvin, Jenn Kachour, and Amanda Yoder	Historical Resources Evaluation Report for the High Desert Corridor, Los Angeles & San Bernardino Counties, California, 07-LA/ 08-SBD, SR-14 to SR-18, EA 116720 EFIS 07-120000-35	Cogstone Resource Management, GPA Consulting	36-003033, 36-004272, 36-006303, 36-006317, 36-006320, 36-010960, 36-023225, 36-026768, 36-026769, 36-026772, 36-026773, 36-026832, 36-027567, 36-027568, 36-027569, 36-027570, 36-027571, 36-027572, 36-027573, 36-027574, 36-061257

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All listed resources have been previously verified by SCCIC staff.

**Resource List**

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-36-010392	CA-SBR-010392/H	Resource Name - TS #1	Site	Prehistoric, Historic	AH04; AP02	2001 (Richard Cerreto, Gallegos & Asst); 2011 (K. Chmiel, ICF); 2015	SB-04435, SB-08163, SB-08164, SB-08165, SB-08166
P-36-061240		Resource Name - A-5; flake; Other - IA1583-6; Other - SBCM-3289	Other	Prehistoric	AP16	1976 (WHITLEY)	

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## APPENDIX B

### NATIVE AMERICAN HERITAGE COMMISSION SACRED LANDS FILE SEARCH





STATE OF CALIFORNIA

Gavin Newsom, Governor

NATIVE AMERICAN HERITAGE COMMISSION

December 30, 2021

David Brunzell  
BCR Consulting LLC

Via Email to: [BCRLLC2008@gmail.com](mailto:BCRLLC2008@gmail.com)

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**Re: Assessor Parcel Number 3210-631-12, -13, and -14 Project, San Bernardino County**

Dear Mr. Brunzell:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: [Andrew.Green@nahc.ca.gov](mailto:Andrew.Green@nahc.ca.gov).

Sincerely,

*Andrew Green*

Andrew Green  
Cultural Resources Analyst

Attachment

**Native American Heritage Commission  
Native American Contact List  
San Bernardino County  
12/30/2021**

**Kern Valley Indian Community**

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Tubatulabal  
Koso

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Fax: (951) 755-5177  
abrierty@morongo-nsn.gov  
Cahuilla  
Serrano

**Quechan Tribe of the Fort Yuma  
Reservation**

Jill McCormick, Historic  
Preservation Officer  
P.O. Box 1899  
Yuma, AZ, 85366  
Phone: (760) 572 - 2423  
historicpreservation@quechantribe.com  
Quechan

**Quechan Tribe of the Fort Yuma  
Reservation**

Manfred Scott, Acting Chairman  
Kw'ts'an Cultural Committee  
P.O. Box 1899  
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Phone: (928) 750 - 2516  
scottmanfred@yahoo.com  
Quechan

**San Fernando Band of Mission  
Indians**

Donna Yocum, Chairperson  
P.O. Box 221838  
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Fax: (503) 574-3308  
ddyocum@comcast.net  
Kitanemuk  
Vanyume  
Tataviam

**San Manuel Band of Mission  
Indians**

Jessica Mauck, Director of  
Cultural Resources  
26569 Community Center Drive  
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Serrano

**Serrano Nation of Mission  
Indians**

Mark Cochrane, Co-Chairperson  
P. O. Box 343  
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serranonation1@gmail.com  
Serrano

**Serrano Nation of Mission  
Indians**

Wayne Walker, Co-Chairperson  
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serranonation1@gmail.com  
Serrano

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Assessor Parcel Number 3210-631-12, -13, and -14 Project, San Bernardino County.

**Native American Heritage Commission  
Native American Contact List  
San Bernardino County  
12/30/2021**

***Twenty-Nine Palms Band of  
Mission Indians***

Anthony Madrigal, Tribal Historic  
Preservation Officer  
46-200 Harrison Place Chemehuevi  
Coachella, CA, 92236  
Phone: (760) 775 - 3259  
amadrigal@29palmsbomi-nsn.gov

***Twenty-Nine Palms Band of  
Mission Indians***

Darrell Mike, Chairperson  
46-200 Harrison Place Chemehuevi  
Coachella, CA, 92236  
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Fax: (760) 863-2449  
29chairman@29palmsbomi-  
nsn.gov

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Assessor Parcel Number 3210-631-12, -13, and -14 Project, San Bernardino County.

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JANUARY 28, 2022

BCR CONSULTING LLC  
CULTURAL RESOURCES ASSESSMENT  
ASSESSOR PARCEL NUMBER 3210-631-14 PROJECT

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**APPENDIX C**  
**PALEONTOLOGICAL RESOURCES ASSESSMENT**



BCR Consulting LLC  
David Brunzell  
505 West 8<sup>th</sup> Street  
Claremont, CA 91711

December 7, 2021

Dear Mr. Brunzell,

This letter presents the results of a record search conducted for the APN 3210-631-12, -13, and -14 (KIM2123) Project in the city of Victorville, San Bernardino County, California. The project site is located north of Rancho Road and west of Koala Road in Section 36, Township 6 North, Range 6 West on the *Adelanto, CA USGS 7.5 minute quadrangle*.

The geologic units underlying this project are mapped entirely as alluvial silt, sand, and gravel deposits dating to the Holocene (Dibblee & Minch, 2008). While Holocene alluvial units are considered to be of high preservation value, material found is unlikely to be fossil material due to the relatively modern associated dates of the deposits. However, if development requires any substantial depth of disturbance, the likelihood of reaching older Holocene or Late Pleistocene alluvial sediments would increase. The Western Science Center does not have localities within the project area or within a 1 mile radius.

While the presence of any fossil material is unlikely, if excavation activity for the APN 3210-631-12, -13 and -14 Project disturbs deeper sediment dating to the earliest parts of the Holocene or Late Pleistocene periods, the material would be scientifically significant. Excavation activity associated with the development of the project area is unlikely to be paleontologically sensitive, but caution during development should be observed.

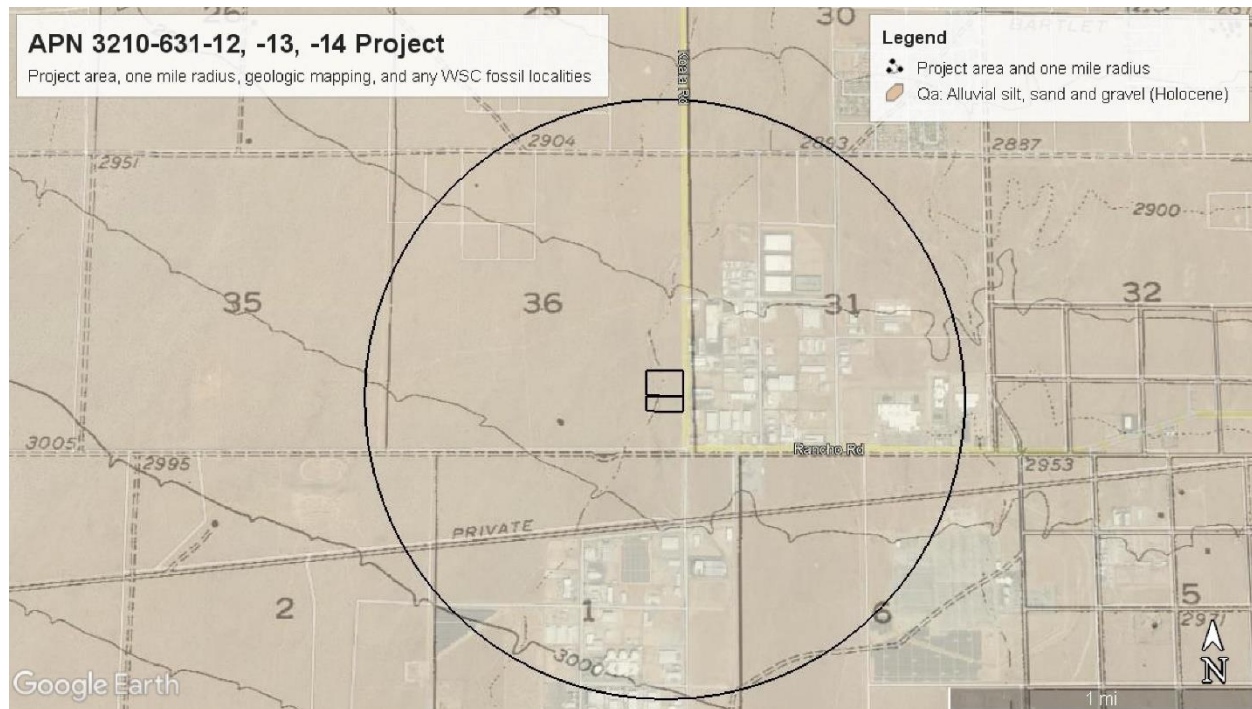
If you have any questions or would like further information, please feel free to contact me at [dradford@westerncentermuseum.org](mailto:dradford@westerncentermuseum.org)

Sincerely,

A handwritten signature in black ink, appearing to read 'Darla Radford', is written over a horizontal line.

Darla Radford  
Collections Manager

2345 Searl Parkway ♦ Hemet, CA 92543 ♦ phone 951.791.0033 ♦ fax 951.791.0032 ♦ [WesternScienceCenter.org](http://WesternScienceCenter.org)



JANUARY 28, 2022

BCR CONSULTING LLC  
CULTURAL RESOURCES ASSESSMENT  
ASSESSOR PARCEL NUMBER 3210-631-14 PROJECT

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**APPENDIX D**  
**PROJECT PHOTOGRAPHS**



JANUARY 28, 2022

BCR CONSULTING LLC  
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ASSESSOR PARCEL NUMBER 3210-631-14 PROJECT





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